

**In the Matter Of:**

**UNITED STATES vs STATE OF GEORGIA**

1:16-CV-03088-ELR

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**LAKESHA STEVENSON**

*September 22, 2022*

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LAKESHA STEVENSON  
UNITED STATES vs STATE OF GEORGIA

September 22, 2022

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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF GEORGIA  
3 ATLANTA DIVISION  
4

5 UNITED STATES OF )  
6 AMERICA, )  
7 Plaintiff, )  
8 vs. )  
9 STATE OF GEORGIA, ) Civil Action No.  
10 Defendant. ) 1:16-CV-03088-ELR  
11 \_\_\_\_\_ )  
12

13 DEPOSITION OF  
14 LAKESHA STEVENSON  
15

16 DATE: Thursday, September 22, 2022  
17

18 TIME: 9:00 a.m. - 5:26 p.m.  
19

20 LOCATION: 500 Fourteenth Street Northwest  
21 Atlanta, Georgia 30318  
22

23 REPORTED BY: Tamika Burnette, RPR, CSR No. 2870  
24  
25

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APPEARANCES

For The Plaintiff:

U.S. Department of Justice

BY: Ms. Michelle L. Tucker, Attorney at Law

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For the Defendant:

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Also Present:

Stacey Subper-Drake, Georgia Department of

Education

Danielle Hernandez, State of Georgia

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PROCEEDINGS

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THE VIDEOGRAPHER: Good morning. We are now on the record. The time is 9:09 a.m. Eastern, on September 22, 2022. This begins the deposition -- video deposition of Lakesha Stevenson in the matter of the United States of America versus the State of Georgia.

This deposition is being taken at Robbins Alloy Belinfante Littlefield in Atlanta, Georgia.

Will all parties identify themselves -- I'm sorry. I'm the videographer today, Summer Menti. Our Court Reporter is Tamika --

Can you tell me your last name again, Tamika?

THE COURT REPORTER: Burnette.

THE VIDEOGRAPHER: Tamika Burnette. Thank you.

We are both with Esquire Deposition.

Counsel and all parties in the room, please state your name and whom you represent, after which our Court Reporter will swear in the witness.

MS. TUCKER: Michelle Tucker for the United States.

MS. TAYLOE: Laura Tayloe for the United

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1 States.

09:09AM

2 MS. JOHNSON: Melanie Johnson for the State  
3 of Georgia, and I'm joined by my colleague Anna  
4 Edmondson, also for the State of Georgia, and Stacey  
5 Suber-Drake, the client representative with the State  
6 Department of Education.

09:09AM

09:09AM

09:09AM

09:09AM

09:09AM

7 THE VIDEOGRAPHER: Go ahead and swear in  
8 the witness.

09:09AM

09:09AM

9 THE COURT REPORTER: Please raise your  
10 right hand.

09:09AM

09:09AM

11 (Witness sworn.)

09:09AM

12 LAKESHA STEVENSON,

13 The witness herein, after having been first  
14 duly sworn to tell the truth, was examined  
15 and testified as follows:

16 THE COURT REPORTER: Thank you.

17 EXAMINATION

18 BY MS. TUCKER:

19 Q. Okay. Good morning, Dr. Stevenson.

09:09AM

20 A. Good morning.

09:09AM

21 Q. Thank you for coming in today. As I said  
22 earlier, my name is Michelle Tucker, and I am a trial  
23 attorney at the U.S. Department of Justice, Civil Rights  
24 Division, Educational Opportunity Section. I represent  
25 the United States in this lawsuit, and I will be taking

09:09AM

09:09AM

09:09AM

09:09AM

09:10AM



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1 your deposition today.

09:10AM

2 A. (Nodding yes.)

09:10AM

3 Q. Would you please state and spell your full name  
4 for the record?

09:10AM

09:10AM

5 A. Lakesha Reyna Stevenson --

09:10AM

6 THE COURT REPORTER: Excuse me. This won't  
7 work. I need the witness close to me.

09:10AM

09:10AM

8 MS. TUCKER: Sure. Okay. Maybe we can go  
9 off the record for a second and we will figure out the  
10 room configuration.

09:10AM

09:10AM

09:10AM

11 THE COURT REPORTER: Okay. No problem.

09:10AM

12 MS. TUCKER: Thank you.

09:10AM

13 (Off the record at 9:11 a.m.)

09:13AM

14 THE VIDEOGRAPHER: Back on the record at  
15 9:15 a.m.

09:13AM

09:13AM

16 MS. TUCKER: Thank you.

09:13AM

17 Q. BY MS. TUCKER: So, Dr. Stevenson, would you  
18 please state and spell your full name for the record?

09:13AM

09:14AM

19 A. Yes. Lakesha Reyna Stevenson, L-A-K-E-S-H-A,  
20 R-E-Y-N-A, S-T-E-V-E-N-S-O-N.

09:14AM

09:14AM

21 Q. Great. Thank you. I'm sure your attorney has  
22 explained much of this to you, but we're basically going  
23 to have a conversation today. I'm going to ask you  
24 questions, your job is to answer them honestly and  
25 completely, okay?

09:14AM

09:14AM

09:14AM

09:14AM

09:14AM



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1 A. Mm-hmm.

09:14AM

2 Q. Okay. You were just sworn to tell the truth by  
3 the Court Reporter.

09:14AM

4 A. Mm-hmm.

5 Q. The oath you took is the same oath you would  
6 take if you were testifying in a court of law; it puts  
7 you under the same obligation to tell the truth that you  
8 would be under court. Do you understand that?

09:14AM

9 A. Yes.

09:14AM

10 Q. Okay. My questions and your answers will be  
11 recorded by the Court Reporter, so please understand  
12 that you will need to speak clearly and answer all  
13 questions orally so the Court Reporter can capture your  
14 answer accurately. For example, she won't be able to  
15 record a nod or a head shake, okay?

09:14AM

09:14AM

09:14AM

09:14AM

09:15AM

09:15AM

16 A. Okay.

09:15AM

17 Q. Okay. The other thing that you and I will need  
18 to do is avoid talking over one another. I will do my  
19 best to not interrupt you when you're answering, and I  
20 will ask you to let me finish my questions before  
21 starting to answer, even if you think that you know how  
22 to respond. Does that make sense?

09:15AM

09:15AM

09:15AM

09:15AM

09:15AM

09:15AM

23 A. Yes.

09:15AM

24 Q. Great. If at any point you do not understand a  
25 question, please do not hesitate to ask me to clarify.

09:15AM

09:15AM

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1 A. Okay.

09:15AM

2 Q. Okay. Note that your attorney may occasionally  
3 object to my questions. This is not to put their  
4 objections and issues -- or this is to put their  
5 objections and issue on the record, it does not mean  
6 that you have to stop answering, unless counsel actually  
7 directs you not to answer.

09:15AM

09:15AM

09:15AM

09:15AM

09:15AM

09:15AM

8 A. Okay.

09:15AM

9 Q. Does that make sense?

09:15AM

10 A. Yes.

09:15AM

11 Q. Great. If you want to take a break for any  
12 reason, that is fine. You see we just did that. It can  
13 happen. I just ask that if a question is pending that  
14 you finish responding before we take a break.

09:15AM

09:16AM

09:16AM

09:16AM

15 A. Okay.

09:16AM

16 Q. Okay. Sometimes it happens that you will give  
17 an answer as completely as you can in that moment, and  
18 then we take a break, or five minutes later you remember  
19 more, that is not an issue, just let us know and we can  
20 go back.

09:16AM

09:16AM

09:16AM

09:16AM

09:16AM

21 A. Okay.

09:16AM

22 Q. Okay. How are you feeling today?

09:16AM

23 A. I'm okay.

09:16AM

24 Q. Good. Is there any reason you will not be able  
25 to answer my questions fully and truthfully today?

09:16AM

09:16AM

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1 A. No. 09:16AM

2 Q. Okay. For example, are you taking any 09:16AM  
3 medication that would inhibit your ability to answer my 09:16AM  
4 questions? 09:16AM

5 A. No. 09:16AM

6 Q. Great. Do you have any questions before we 09:16AM  
7 proceed? 09:16AM

8 A. I don't think so. 09:16AM

9 Q. Okay. Great. Thank you. 09:16AM

10 MS. TUCKER: So I'd like the Court Reporter 09:16AM  
11 to mark this document as Plaintiff's Exhibit 418. 09:16AM

12 (Plaintiff's Exhibit 418 marked for 09:16AM  
13 identification.) 09:16AM

14 Q. BY MS. TUCKER: Dr. Stevenson, this is the 09:17AM  
15 deposition notice that we served for your deposition in 09:17AM  
16 connection with the lawsuit against the State of 09:17AM  
17 Georgia. So this is the deposition notice that we 09:17AM  
18 served for your deposition in connection with the 09:17AM  
19 lawsuit against the State of Georgia relating to the 09:17AM  
20 Georgia Network for Educational and Therapeutic Support 09:17AM  
21 group program, which is commonly referred to as the 09:17AM  
22 GNETS program. 09:17AM

23 Dr. Stevenson, have you seen this 09:17AM  
24 deposition notice before? 09:17AM

25 A. No. 09:17AM

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1 Q. Okay. How were you made aware that we were 09:17AM  
2 deposing you today? 09:17AM

3 A. I received a notice from the attorney. 09:17AM

4 Q. Okay. That didn't include this document, it 09:17AM  
5 was an e-mail? 09:17AM

6 A. It was a phone call. 09:17AM

7 Q. A phone call. All right. When was that phone 09:17AM  
8 call? 09:17AM

9 A. I don't remember the exact day. 09:18AM

10 Q. Okay. In the last week, two weeks, three 09:18AM  
11 weeks? 09:18AM

12 A. Within the last two weeks. 09:18AM

13 Q. Okay. And when you say "attorney," who do you 09:18AM  
14 mean? 09:18AM

15 A. Stacey. 09:18AM

16 Q. Stacey. Okay. And then what is your 09:18AM  
17 understanding of what this lawsuit is about? 09:18AM

18 A. My understanding is there are some things that 09:18AM  
19 the DOJ is alleging the State has done that is not been 09:18AM  
20 in the best interest of students. 09:18AM

21 Q. Okay. Do you know what some of those 09:18AM  
22 allegations are or what your understanding of some of 09:18AM  
23 those allegations are? 09:18AM

24 A. To my understanding, some of the allegations 09:19AM  
25 were the unsafe facilities, I believe I've heard that 09:19AM

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1 before.

09:19AM

2 Q. Okay. Anything else?

09:19AM

3 A. And a lack of access to certain things.

09:19AM

4 Q. Have you read any court filings in connection  
5 with this lawsuit?

09:19AM

09:19AM

6 A. I have not.

09:19AM

7 Q. Okay. Do you recall receiving a litigation  
8 hold in this lawsuit?

09:19AM

09:19AM

9 A. I do not.

09:19AM

10 Q. A litigation hold is a notice that would advise  
11 you not to delete e-mails or documents. Do you recall  
12 receiving something like that?

09:19AM

09:19AM

09:20AM

13 A. You said it's a document?

09:20AM

14 Q. It could be a document or an e-mail advising  
15 you not to get rid of e-mails or documents.

09:20AM

09:20AM

16 A. I'm not sure I received a document, but I did  
17 receive that information from the attorneys.

09:20AM

09:20AM

18 Q. Okay. And when you say "the attorneys," you  
19 mean?

09:20AM

09:20AM

20 A. From Stacey.

09:20AM

21 Q. From Stacey. Okay. Dr. Stevenson, were you  
22 asked to collect documents as part of the State's effort  
23 to respond to DOJ request in this lawsuit?

09:20AM

09:20AM

09:20AM

24 A. And when you say "collect documents," what do  
25 you mean?

09:20AM

09:20AM

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1 Q. Were you asked to collect physical documents or  
2 information in response to one of DOJ's request in this  
3 lawsuit?

4 A. Yes.

5 Q. Okay. Who asked you to do that?

6 A. Within a meeting with my program manager and  
7 Stacey.

8 Q. Okay. And who is your program manager?

9 A. Vickie Cleveland.

10 Q. Okay. What steps did you take to gather  
11 that -- those documents and information?

12 A. Depending on, I guess, what the request would  
13 be.

14 Q. Mm-hmm.

15 A. If it's information that is in the portal, I  
16 would just go to the portal, download the information.  
17 Or if it was information I might have had as making, you  
18 know, presentation or something, I might have it on my  
19 computer or something we've e-mailed a presentation or  
20 any documents, I would just download it.

21 Q. Okay. And when you say "the portal," what do  
22 you mean?

23 A. The portal is what we use at the Department of  
24 Education for secure information --

25 Q. Mm-hmm.

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1	A. -- where we house different -- I don't know	09:21AM
2	what you would call it -- platforms --	09:21AM
3	Q. Okay.	09:21AM
4	A. -- for LEAs to upload secure information for us	09:22AM
5	to review.	09:22AM
6	Q. Okay. And by "LEAs" you mean school districts?	09:22AM
7	A. Yes.	09:22AM
8	Q. Okay. So for today, am I correct that you're	09:22AM
9	being represented by Melanie Johnson --	09:22AM
10	A. Yes.	09:22AM
11	Q. -- for the purpose of the deposition?	09:22AM
12	A. Yes.	09:22AM
13	Q. Okay. Did you talk to anyone to prepare for	09:22AM
14	this deposition today?	09:22AM
15	A. Melanie.	09:22AM
16	Q. Okay. When?	09:22AM
17	A. Yesterday.	09:22AM
18	Q. Okay. Was anyone else on the call?	09:22AM
19	A. Yes. Stacey and Anna.	09:22AM
20	Q. Okay. And was it a call? I assumed it was,	09:22AM
21	but was it a phone call?	09:22AM
22	A. Yes.	09:22AM
23	Q. And how long did you meet?	09:22AM
24	A. 45 minutes.	09:22AM
25	Q. Okay. Did you talk with anyone else about this	09:22AM

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1	deposition?	09:22AM
2	A. No.	09:22AM
3	Q. Did you speak with Vickie Cleveland, your	09:23AM
4	program manager, about it?	09:23AM
5	A. What do you mean "about it"?	09:23AM
6	Q. Did you let her know that you were -- you had a	09:23AM
7	deposition today?	09:23AM
8	A. She knows. I had to. I'm off work.	09:23AM
9	Q. Yeah. Did you talk to her about the	09:23AM
10	deposition --	09:23AM
11	A. No.	09:23AM
12	Q. -- and what was to be discussed?	09:23AM
13	A. No.	09:23AM
14	Q. Did she identify any documents that she thought	09:23AM
15	would be helpful for your review?	09:23AM
16	A. No.	09:23AM
17	Q. Okay. Did she tell you anything about her	09:23AM
18	deposition?	09:23AM
19	A. No.	09:23AM
20	Q. Okay. Did you look at any documents to prepare	09:23AM
21	for today's deposition?	09:23AM
22	A. I did not.	09:23AM
23	Q. Okay. Did you bring any documents with you	09:23AM
24	today?	09:23AM
25	A. I did not.	09:23AM



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16

1 Q. Okay. Did you ask anyone about documents that 09:23AM  
2 could be relevant for today's deposition? 09:23AM

3 A. I did not. 09:23AM

4 Q. Okay. Did you do anything to prepare? 09:23AM

5 A. No. 09:23AM

6 Q. Have you been deposed before, Dr. Stevenson? 09:23AM

7 A. I have not. 09:24AM

8 Q. Okay. And have you ever been a plaintiff in a 09:24AM  
9 lawsuit? 09:24AM

10 A. No, I have not. 09:24AM

11 Q. Have you ever been a defendant in a lawsuit? 09:24AM

12 A. No, I have not. 09:24AM

13 Q. Okay. So there are a few acronyms and 09:24AM  
14 definitions I'd like to go over to confirm that we have 09:24AM  
15 the same understanding as we continue to move forward. 09:24AM

16 A. Okay. 09:24AM

17 Q. When I refer to GaDOE, you understand that I 09:24AM  
18 mean the Georgia Department of Education? 09:24AM

19 A. Yes. 09:24AM

20 Q. Okay. When I refer to GNETS or GNETS program, 09:24AM  
21 you understand that I'm referring to the Georgia Network 09:24AM  
22 for Educational and Therapeutic Support? 09:24AM

23 A. Yes. 09:24AM

24 Q. When I refer to regional GNETS program, you 09:24AM  
25 understand that I am referring to one of the 24 regional 09:24AM



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17

1 GNETS programs across the State of Georgia?

09:24AM

2 A. Yes.

09:24AM

3 Q. When I refer to GNETS center or centers, you  
4 understand that I'm referring to a standalone GNETS  
5 location?

09:24AM

09:24AM

09:24AM

6 A. Yes.

09:24AM

7 Q. When I refer to GNETS school-based locations,  
8 you understand that I am referring to a GNETS location  
9 that's based in a general education setting?

09:24AM

09:25AM

09:25AM

10 A. Yes.

09:25AM

11 Q. When I refer to general education setting, you  
12 understand that I'm referring to a public school in  
13 Georgia where students with emotional and behavioral  
14 disorders and other behavior health conditions receive  
15 instructions and services alongside students who do not  
16 have a disability?

09:25AM

09:25AM

09:25AM

09:25AM

09:25AM

09:25AM

17 A. Can you repeat that?

09:25AM

18 Q. I'd be happy to.

09:25AM

19 When I refer to a general education  
20 setting, do you understand that I mean a public school  
21 in Georgia, where students with emotional and behavior  
22 disorders and other behavioral health conditions,  
23 receive instructions and services alongside students who  
24 do not have disabilities?

09:25AM

09:25AM

09:25AM

09:25AM

09:25AM

09:25AM

25 A. I understand that's what that means, yes.

09:25AM

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1 Q. Okay. When I refer to EBD, do you understand  
2 that I'm referring to emotional and behavior disorders?

3 A. Yes.

4 Q. When I refer to LEA, you understand that I'm  
5 referring to a local education agency or school  
6 district?

7 A. Yes.

8 Q. When I refer to SEA, you understand that I'm  
9 referring to the State Education Agency?

10 A. Yes.

11 Q. When I refer to RESA, you understand that I'm  
12 referring to the Regional Education Service Agency?

13 A. Yes.

14 Q. When I refer to BIP, you understand that I'm  
15 referring to a behaviorial intervention plan?

16 A. Yes.

17 Q. When I refer to FBA, you understand that I'm  
18 referring to a functional behavior assessment?

19 A. Yes.

20 Q. When I referred to GDBHDD, you understand that  
21 I'm referring to Georgia's Department of Behavioral  
22 Health and Developmental Disabilities?

23 A. Yes.

24 Q. And when I refer to DCH, you understand that  
25 I'm referring to the Georgia Department to Community

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1	Health?	09:26AM
2	A. Yes.	09:26AM
3	Q. Great. Thank you. I know that was a few	09:26AM
4	definitions to get through.	09:27AM
5	MS. TUCKER: I'd like the Court Reporter to	09:27AM
6	mark this document as Plaintiff's Exhibit 419.	09:27AM
7	(Plaintiff's Exhibit 419 marked for	09:27AM
8	identification.)	09:27AM
9	Q. BY MS. TUCKER: Okay. The Bates number on the	09:27AM
10	first page of this exhibit is GA02598820. This is a	09:27AM
11	July 30th, 2018 e-mail from you, Dr. Stevenson, to the	09:27AM
12	e-mail recruiter, with the subject: "Job Announcement	09:27AM
13	No. 18-77." And there are four attachments.	09:27AM
14	A. (Witness examining document.)	09:27AM
15	Q. Dr. Stevenson, do you recognize this e-mail?	09:27AM
16	A. Yes.	09:28AM
17	Q. Okay. And am I correct that this is the e-mail	09:28AM
18	that you sent to GaDOE's job recruiter to apply for a	09:28AM
19	job announcement 18-77?	09:28AM
20	A. That's what it says, yeah.	09:28AM
21	Q. Do you have any reason to doubt the e-mail?	09:28AM
22	A. No.	09:28AM
23	Q. Okay. Do you recall if this is the application	09:28AM
24	you submitted for your current position?	09:28AM
25	A. I don't recall but I guess it is.	09:28AM

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20

1 Q. All right. F you take a look at -- starting at 09:28AM  
2 GA00 or 02598826. 09:28AM  
3 A. Where? 09:28AM  
4 MS. JOHNSON: (Indicating.) 09:28AM  
5 THE WITNESS: Okay. 09:28AM  
6 Q. BY MS. TUCKER: Do you see the numbers at the 09:28AM  
7 bottom? 09:28AM  
8 A. Yes. 09:28AM  
9 Q. Great. Maybe you'd want to take a look at 09:28AM  
10 that. 09:28AM  
11 A. Yes, it is. 09:28AM  
12 Q. Okay. So I'm correct that you applied for the 09:28AM  
13 GNETS program specialist job on July 30th, 2018? 09:28AM  
14 A. Yes. 09:29AM  
15 Q. Okay. Thank you. Let's turn to the attachment 09:29AM  
16 that starts with GA02598823. 09:29AM  
17 A. Okay. 09:29AM  
18 Q. Okay. Dr. Stevenson, do you recognize this 09:29AM  
19 document? 09:29AM  
20 A. Yes. 09:29AM  
21 Q. Am I correct that this is your resume current 09:29AM  
22 through the date of the e-mail, July 30th, 2018? 09:29AM  
23 A. Yes. 09:29AM  
24 Q. Okay. And this would reflect your education 09:29AM  
25 and professional experience to that date? 09:29AM

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1	A. Yes.	09:29AM
2	Q. Okay. We're going to go through some of this	09:29AM
3	together. So what is your highest level of education?	09:29AM
4	A. Doctorate.	09:29AM
5	Q. Great. And when did you receive that degree?	09:29AM
6	A. 2017.	09:29AM
7	Q. Okay. And where is it from?	09:29AM
8	A. NOVA Southeastern University.	09:29AM
9	Q. And it's a doctorate in?	09:29AM
10	A. Education.	09:29AM
11	Q. Education?	09:30AM
12	A. Mm-hmm.	09:30AM
13	Q. Okay.	09:30AM
14	A. It's an education doctor, EdD.	09:30AM
15	Q. EdD. Got it. I know that -- I see that the	09:30AM
16	resume references Special Education next to your EdD.	09:30AM
17	Do you see that?	09:30AM
18	A. Yes.	09:30AM
19	Q. Is that a certificate on top of the education	09:30AM
20	doctorate or --	09:30AM
21	A. That was my content concentration.	09:30AM
22	Q. Okay. Thank you for clarifying.	09:30AM
23	A. Mm-hmm.	09:30AM
24	Q. Where did you attend college?	09:30AM
25	A. Undergrad?	09:30AM

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1	Q. Mm-hmm.	09:30AM
2	A. Auburn University.	09:30AM
3	Q. And when did you graduate from Auburn?	09:30AM
4	A. 2001.	09:30AM
5	Q. Okay. And what degree did you receive?	09:30AM
6	A. Special Education. Then, it was called	09:30AM
7	Learning Disability and Behavioral Disorders.	09:30AM
8	Q. Okay. What other degrees do you have?	09:30AM
9	A. A Master's in Special Education from Georgia	09:30AM
10	State University.	09:30AM
11	Q. Okay. And when did you receive that?	09:30AM
12	A. 2004.	09:30AM
13	Q. And any other degrees?	09:30AM
14	A. Educational Leadership, Regent University,	09:30AM
15	2009.	09:31AM
16	Q. Thank you, Dr. Stevenson. Let's turn to the	09:31AM
17	attachment to this e-mail that starts with GA02598821.	09:31AM
18	Let me know when you see that.	09:31AM
19	A. Okay.	09:31AM
20	Q. Do you recognize this document?	09:31AM
21	A. Yes.	09:31AM
22	Q. Okay. Am I correct that this document outlines	09:31AM
23	all the certifications you held both current and expired	09:31AM
24	when you applied for the position in 2018?	09:31AM
25	A. Yes.	09:31AM

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1	Q. Okay. It appears that many of these	09:31AM
2	certifications expired in June 2021, correct?	09:31AM
3	A. (Witness examining document.)	09:31AM
4	Q. If I was to look at the end validity column --	09:31AM
5	A. Mm-hmm.	09:31AM
6	Q. Do you see that?	09:31AM
7	A. Mm-hmm. They have been renewed.	09:31AM
8	Q. They have been renewed?	09:31AM
9	A. Yes.	09:31AM
10	Q. Have all of these listed been renewed?	09:31AM
11	A. Yes.	09:32AM
12	Q. Okay. And when were they reviewed?	09:32AM
13	A. Prior to those expiring. I don't know the	09:32AM
14	exact date I renewed them.	09:32AM
15	Q. Do you know how long the certifications are	09:32AM
16	current for now?	09:32AM
17	A. I think five years. Five or six years. I'm	09:32AM
18	not sure.	09:32AM
19	Q. Okay. Are there any additional professional	09:32AM
20	certifications that you hold right now?	09:32AM
21	A. No.	09:32AM
22	Q. Okay. Let's turn back to the resume, which	09:32AM
23	begins on GA02598823, to learn more about your	09:32AM
24	professional background.	09:32AM
25	A. Okay.	09:36AM



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1 Q. Well, actually, just pause for one second. 09:32AM

2 THE VIDEOGRAPHER: Yeah, let's go off the 09:32AM

3 record. 09:32AM

4 MS. TUCKER: Yes, we'll go off the record 09:32AM

5 for one second. 09:33AM

6 (Off the record.) 09:33AM

7 THE VIDEOGRAPHER: At 9:34 a.m. 09:33AM

8 (Off the record at 9:34 a.m.) 09:35AM

9 THE VIDEOGRAPHER: Stand by. Back on the 09:35AM

10 record at 9:36 a.m. 09:35AM

11 Q. BY MS. TUCKER: Dr. Stevenson, let's turn back 09:35AM

12 to your resume that starts with GA02598823, just to 09:35AM

13 learn a little bit more about your professional 09:35AM

14 background. 09:35AM

15 Who is your current employer? 09:35AM

16 A. Georgia Department of Education. 09:36AM

17 Q. Okay. And this is in the GNETS program 09:36AM

18 specialist role? 09:36AM

19 A. Yes. 09:36AM

20 Q. Okay. When did you officially assume this 09:36AM

21 position? 09:36AM

22 A. In 2018. 09:36AM

23 Q. Do you remember what month? 09:36AM

24 A. I do not. 09:36AM

25 Q. Okay. And then who did you interview with? 09:36AM

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1 A. I know Vickie Cleveland was there, and I do not  
2 remember who else was there.

3 Q. Okay. Do you remember if it was quickly after  
4 you applied?

5 A. I do not.

6 Q. Okay. And do you report to Vickie Cleveland?

7 A. Yes.

8 Q. Okay. And earlier you said her role was  
9 program manager --

10 A. Yes.

11 Q. -- for GNETS?

12 A. Yes.

13 Q. Okay. Have you always reported to Vickie  
14 Cleveland in this role?

15 A. In this role, yes.

16 Q. Okay. Did you know Vickie Cleveland before  
17 assuming this position?

18 A. Yes.

19 Q. Okay. How did you know Vickie Cleveland?

20 A. We worked at the Georgia Department of  
21 Education together.

22 Q. Okay. In what roles in GaDOE had you worked  
23 together before?

24 A. She was a program specialist for the  
25 Results-Driven Accountability unit, and I also was a

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1 program specialist for the Results-Driven Accountability  
2 unit.

3 Q. And is that within the Special Education  
4 division?

5 A. It is.

6 Q. How long, approximately, did you work together?

7 A. About a year.

8 Q. Before you assumed this position, did you work  
9 with Vickie Cleveland on any matters related to GNETS?

10 A. No.

11 Q. Okay. Who evaluates you?

12 A. Vickie Cleveland.

13 Q. Okay. Anyone else?

14 A. No.

15 Q. Okay. Do you have any direct reports in this  
16 position?

17 A. I do not.

18 Q. Okay. Have you in the past?

19 A. I have not.

20 Q. Okay. So before working as a GNETS program  
21 specialist, what was that prior position?

22 A. Results-Driven Accountability program  
23 specialist.

24 Q. And when did you assume this position?

25 A. 2017.

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1 Q. Looking at the resume, do you think -- would it  
2 be 2016?

3 A. No. I held another position --

4 Q. Oh, okay.

5 A. -- before that.

6 Q. Got it. So this result-driven accountability  
7 program specialist was 2017?

8 A. Mm-hmm.

9 Q. Okay. And this was within GaDOE?

10 A. It is.

11 Q. Who did you report to?

12 A. Winter Lowe.

13 Q. Okay. Did you have any direct reports in that  
14 role?

15 A. I did not.

16 Q. Okay. When you were in that role, did you  
17 interact with any GaDOE colleagues working on the GNETS  
18 program?

19 A. I did not.

20 Q. Okay. Did you interact with any regional GNETS  
21 programs when you were in that role?

22 A. Can you explain?

23 Q. Yes. When you were a program specialist for  
24 the Results-Driven Accountability division --

25 A. Mm-hmm.

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1	Q. -- within GaDOE, did you interact with any	09:39AM
2	regional GNETS programs?	09:39AM
3	A. Interact, that's the question I'm asking. What	09:39AM
4	do you mean by "interact"?	09:39AM
5	Q. Did you communicate, did you train, any sort of	09:39AM
6	interaction?	09:39AM
7	A. Within my job duties we had meetings with	09:39AM
8	everybody. So --	09:39AM
9	Q. Okay.	09:39AM
10	A. -- if they were at the meeting, then yes.	09:39AM
11	Q. And by "everybody," do you mean --	09:39AM
12	A. The specialist director, and the GNETS	09:39AM
13	directors, we would have joint meetings.	09:39AM
14	Q. Okay. Got it. And prior to this program	09:39AM
15	specialist position, what program specialist -- did you	09:39AM
16	hold a different program specialist?	09:40AM
17	A. I did.	09:40AM
18	Q. And what was that?	09:40AM
19	A. That was within the Georgia IEP, GO-IEP, which	09:40AM
20	is a statewide IEP program --	09:40AM
21	Q. Okay.	09:40AM
22	A. -- within Special Education.	09:40AM
23	Q. Who was your supervisor then?	09:40AM
24	A. Linda Castellanos.	09:40AM
25	Q. Okay. And when did you assume that position?	09:40AM

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1 A. In 2016.

09:40AM

2 Q. Okay. So you were in it for about a year?

09:40AM

3 A. Mm-hmm.

09:40AM

4 Q. Okay. When you were a program specialist for  
5 GO-IEP, did you interact with GaDOE colleagues working  
6 on the GNETS program?

09:40AM

09:40AM

09:40AM

7 A. No.

09:40AM

8 Q. Did you interact with regional GNETS programs  
9 while in this role?

09:40AM

09:40AM

10 A. If they needed training on GO-IEP, then yes.

09:40AM

11 Q. Okay. Did folks reach out for you to training  
12 on GO-IEP?

09:40AM

09:40AM

13 A. We were assigned regions, so if they were  
14 within my region and they needed training, or they  
15 didn't reach out to me, they could reach out to one of  
16 my colleagues, and then we were assigned to do those  
17 trainings.

09:40AM

09:41AM

09:41AM

09:41AM

09:41AM

18 Q. What region did you have?

09:41AM

19 A. That's a very good question. It changed so  
20 much.

09:41AM

09:41AM

21 Q. Okay.

09:41AM

22 A. So I might have started with mid-Georgia, and  
23 then as they hired more people, I was more wherever I  
24 needed to be, wherever somebody needed support.

09:41AM

09:41AM

09:41AM

25 Q. Okay. So lots of driving around the state?

09:41AM

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1 A. Yeah, lots of driving around the state. 09:41AM

2 Q. Okay. Prior to this program specialist job, 09:41AM

3 what position did you hold? 09:41AM

4 A. Specialist education lead in Atlanta Public 09:41AM

5 Schools. 09:41AM

6 Q. Okay. And when did you assume this position? 09:41AM

7 A. 2015. 09:41AM

8 Q. Okay. So you were also in this for about a 09:42AM

9 year? 09:42AM

10 A. A year and some change. 09:42AM

11 Q. A year and some change. Okay. So your 09:42AM

12 employer was Atlanta Public Schools? 09:42AM

13 A. Yes. 09:42AM

14 Q. What is the role of a special education lead? 09:42AM

15 A. Within that role we monitor for compliance, a 09:42AM

16 specific set of schools that we're assigned to, and 09:42AM

17 provide support to teachers, provide training to 09:42AM

18 teachers, do a lot of paperwork, and attend IEP meetings 09:42AM

19 when needed. 09:42AM

20 Q. Okay. While you were in this role with Atlanta 09:42AM

21 Public Schools, were you assigned to any GNETS programs? 09:42AM

22 A. No. 09:42AM

23 Q. Did you interact with GaDOE colleagues working 09:42AM

24 on GNETS programs while you were in this role? 09:42AM

25 A. No. 09:42AM

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1 Q. Okay. And so -- did you not interact with  
2 North Metro or South Metro GNETS program?

3 A. I never had -- I never had any students who  
4 attended that program while in Atlanta Public Schools.

5 Q. Okay.

6 A. At the schools I was working with, there were  
7 no student that attended.

8 Q. Understood. And then did any of your students  
9 at the schools you were working at, were there ever any  
10 referrals to GNETS while you were there?

11 A. I don't recall.

12 Q. Okay. Before Atlanta Public Schools, where did  
13 you work?

14 A. DeKalb County Public Schools.

15 Q. And what was the role?

16 A. Special education lead.

17 Q. Were your responsibilities --

18 A. The same.

19 Q. Okay. When you were with DeKalb County Public  
20 Schools, did you interact with any GaDOE colleagues  
21 working on the GNETS program?

22 A. I did not.

23 Q. Did you interact with the DeKalb Rockdale GNETS  
24 program?

25 A. Interaction would be the director would come



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1 speak to us about GNETS once a year, and that was my  
2 only interaction.

3 Q. Okay. By "us," who do you mean?

4 A. The special education leads.

5 Q. Okay. How many were there?

6 A. Oh, gosh. I don't even know.

7 Q. Okay.

8 A. Quite a few.

9 Q. Five, 10?

10 A. Oh, more than that.

11 Q. Okay.

12 A. It was elementary, middle, and high school  
13 leads.

14 Q. Okay.

15 A. So it was quite a few.

16 Q. Okay. Understood. And then how long were you  
17 with DeKalb County Schools?

18 A. I think I started there in 2009.

19 Q. Okay. And before you were at DeKalb County,  
20 where were you?

21 A. Fulton County.

22 Q. Okay. Fulton County?

23 A. Mm-hmm.

24 Q. And --

25 A. In between I worked at Renaissance.

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1 Q. Okay. Let's start with Renaissance.

09:45AM

2 A. Okay.

09:45AM

3 Q. What was Renaissance?

09:45AM

4 A. Renaissance Learning has a platform called Star  
5 Reading and Star Math, and I was a training/consultant  
6 for them.

09:45AM

09:45AM

09:45AM

7 Q. Okay. And was this focused on special  
8 education as well or --

09:45AM

09:45AM

9 A. It was anybody. It wasn't just special  
10 education.

09:45AM

09:45AM

11 Q. Okay.

09:45AM

12 A. But I was familiar with the program from my  
13 time using it in the classroom.

09:45AM

09:45AM

14 Q. Okay. In what classroom would that have been?

09:45AM

15 A. When I was in Fulton County.

09:45AM

16 Q. Okay. So at -- before Renaissance, you were at  
17 Fulton County?

09:45AM

09:45AM

18 A. Well, Renaissance was during Fulton/Atlanta.  
19 It wasn't separate, or Fulton/DeKalb. So I did both.

09:45AM

09:45AM

20 Q. Okay. Got it. So when you were at DeKalb and  
21 when you were at Fulton, you worked part-time --

09:45AM

09:45AM

22 A. Mm-hmm.

09:45AM

23 Q. -- through Renaissance? Okay. Thank you for  
24 that clarification.

09:45AM

09:46AM

25 A. Mm-hmm.

09:46AM

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1	Q. So let's go back. Keep going backwards. So in	09:46AM
2	Fulton County, where were you?	09:46AM
3	A. I was at Hapeville Elementary School.	09:46AM
4	Q. And what were you doing at Hapeville Elementary	09:46AM
5	School?	09:46AM
6	A. I was a special education teacher.	09:46AM
7	Q. And when did you start at Hapeville?	09:46AM
8	A. In 2005.	09:46AM
9	Q. Okay. And how long were you there?	09:46AM
10	A. To 2009.	09:46AM
11	Q. Got it. Who did you report to at Hapeville?	09:46AM
12	A. The principal was Juanita Nelson.	09:46AM
13	Q. Okay. Did you interact with any regional GNETS	09:46AM
14	programs in this role?	09:46AM
15	A. I did not.	09:46AM
16	Q. Okay. Did any of your students move to the	09:46AM
17	GNETS program while you were a special education	09:46AM
18	teacher --	09:46AM
19	A. No.	09:46AM
20	Q. -- at Hapeville Elementary? I'm sorry?	09:46AM
21	A. No.	09:46AM
22	Q. Were there any students that were referred to	09:47AM
23	the GNETS program while you were at Hapeville	09:47AM
24	Elementary?	09:47AM
25	A. No.	09:47AM

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1 Q. Okay. And before Hapeville Elementary, where  
2 were you?

3 A. Marietta High School.

4 Q. Okay. And what years were you there?

5 A. 2001 to 2005.

6 Q. And what was your position?

7 A. Special education teacher.

8 Q. Okay. And what county is Marietta High School  
9 in?

10 A. Marietta City.

11 Q. Marietta City. That's the school district?

12 A. Mm-hmm.

13 Q. Okay. And did you interact with any regional  
14 GNETS programs while in this role?

15 A. No.

16 Q. Okay. Did any of your students move to a  
17 regional GNETS program in this role?

18 A. No.

19 Q. Were any referred?

20 A. No.

21 Q. Okay. When did you first become aware of the  
22 GNETS program?

23 A. When I was in Marietta, Marietta High School.

24 Q. Okay. Got it. And what were you -- how did  
25 you find out about it?

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1 A. It was discussed during preplanning. There's a  
2 presentation of a lot of different things and that was  
3 one of the things they discussed.

4 Q. Okay. So during your times teaching in a  
5 special education leads, you never -- am I correct that  
6 you did not have a student attend GNETS?

7 A. I did not have a student attend GNETS.

8 Q. Okay. Thank you. I'm interested in learning  
9 more about your role as a GNETS program specialist?

10 A. Mm-hmm.

11 Q. Why did you choose to apply in July 2018?

12 A. I've always worked with students that had  
13 emotional behavioral disorders.

14 Q. Okay.

15 A. So that was one of the reasons I applied for  
16 the job. I was also -- I've always also been interested  
17 in learning more -- I wouldn't say learning more, I  
18 would just say because of my work, my previous work with  
19 students with emotional behavioral disorders.

20 Q. Okay. Thank you.

21 MS. TUCKER: I'd like the Court Reporter to  
22 mark this document as Plaintiff's Exhibit 420.

23 (Plaintiff's Exhibit 420 marked for  
24 identification.)

25 Q. BY MS. TUCKER: I'll wait until you get it.

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1 Okay. The Bates number on the first page of this  
2 exhibit is GA00119322. This is a July 2018 e-mail  
3 thread, including Crystal Albright, Karen Flowers,  
4 Zelfphine Smith-Dixon, Vickie Cleveland, and Shanita  
5 Howard. The most recent e-mail in the thread is dated  
6 July 29th, 2018, with a subject of "Permission to post  
7 new position GNETS." There's one attachment.

8 A. (Witness examining document.)

9 Q. Dr. Stevenson, please take a look at the  
10 attachment beginning at GA00119324. The top reads that  
11 it's a posting for job 18-77 GNETS program specialist.

12 A. (Witness examining document.)

13 Q. Do you recognize this as the job posting that  
14 you applied for?

15 A. Yes.

16 Q. Okay. Let's turn back to that cover e-mail.  
17 Who is Crystal Albright?

18 A. I don't know.

19 Q. Okay. Who is Karen Flowers?

20 A. I think she was a budget analyst.

21 Q. Okay. Who is Shanita Howard?

22 A. I don't know.

23 Q. Okay. And then who is Zelfphine Smith-Dixon?

24 A. She is the former Special Education director  
25 for the State of Georgia.

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1	Q. And you said "former." Do you recall when	09:51AM
2	Zelphine Smith-Dixon left GaDOE?	09:52AM
3	A. I do not.	09:52AM
4	Q. Okay. Did you work with Zelphine Smith-Dixon?	09:52AM
5	A. She was the director, so if there was something	09:52AM
6	she needed us to do, then I would do it.	09:52AM
7	Q. Okay. Looking back at the posting that starts	09:52AM
8	with GA00119324. Okay. This is the posting that you	09:52AM
9	were ultimately hired into?	09:52AM
10	A. Mm-hmm.	09:52AM
11	Q. Correct?	09:52AM
12	A. Mm-hmm.	09:52AM
13	Q. We'll just have to say yes.	09:52AM
14	A. I'm sorry. Yes.	09:52AM
15	Q. It's okay. Yes, just --	09:52AM
16	A. Yes.	09:52AM
17	Q. -- to get into the rhythm of it.	09:52AM
18	A. Okay.	09:52AM
19	Q. Did anyone in GaDOE talk to you about this role	09:52AM
20	in advance of you applying?	09:52AM
21	A. Talk to me, like, what do you mean?	09:52AM
22	Q. Let you know that a GNETS program specialist	09:52AM
23	position was coming available?	09:52AM
24	A. It was kind of common knowledge.	09:52AM
25	Q. Okay. Got it. Folks were just aware that the	09:52AM

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1 GNETS program needed additional people?

09:53AM

2 A. Mm-hmm.

09:53AM

3 Q. Is that a yes?

09:53AM

4 A. Yes.

09:53AM

5 Q. Okay. Great. What -- were they saying  
6 anything else about the job?

09:53AM

09:53AM

7 A. No.

09:53AM

8 Q. Okay. Let's take a look at the box with the  
9 two paragraphs towards the top. The box starts with  
10 "Provides general supervision."

09:53AM

09:53AM

09:53AM

11 A. Mm-hmm.

09:53AM

12 Q. Do you see that?

09:53AM

13 A. Yes.

09:53AM

14 Q. Okay. I want you to take a look at the  
15 description. And would you agree that this box  
16 describes the duties of the GNETS program specialist?

09:53AM

09:53AM

09:53AM

17 A. (Witness examining document.) Yes.

09:53AM

18 Q. Okay. Thank you, Dr. Stevenson. Let's look at  
19 this a little bit more. Where the post -- do you see  
20 where the posting reads: "Provides general supervision  
21 for the Georgia Network for Educational and Therapeutic  
22 Support, GNETS"?

09:54AM

09:54AM

09:54AM

09:54AM

09:54AM

23 A. Yes.

09:54AM

24 Q. As GNETS program specialist, in what ways do  
25 you provide general supervision for GNETS?

09:54AM

09:54AM



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1 A. I provide general supervision for GNETS by 09:54AM  
2 answering any questions that the directors may have in 09:54AM  
3 regards to the strategic plan or the grand application 09:54AM  
4 or i-Ready, Basc, or any of the programs that -- that 09:54AM  
5 they use. 09:54AM

6 Q. Okay. So you answer questions? 09:55AM

7 A. Mm-hmm. 09:55AM

8 Q. What other ways do you provide supervision? 09:55AM

9 A. By reviewing grant applications and the 09:55AM  
10 strategic plan. 09:55AM

11 Q. Okay. Next, do you see where it reads: 09:55AM

12 "Duties include collaborating with the Georgia 09:55AM  
13 Department of Education GaDOE team by building 09:55AM  
14 professional learning structures"? 09:55AM

15 A. Mm-hmm. 09:55AM

16 Q. Okay. As GNETS program specialist, in what 09:55AM  
17 ways do you build professional learning structures? 09:55AM

18 A. We collaborate with -- for example, we 09:55AM  
19 collaborate -- collaborated with Georgia State for the 09:55AM  
20 FBA/BIP training. 09:55AM

21 Q. Yes? 09:55AM

22 A. We also did a collaboration with Georgia State 09:55AM  
23 for trauma-informed care. 09:55AM

24 Q. Okay. 09:55AM

25 A. We will also collaborate with colleagues within 09:55AM

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1 the Special Education department to facilitate  
2 professional learning for the GNETS directors.

3 Q. Okay. So with Georgia State and then within  
4 GaDOE?

5 A. Mm-hmm.

6 Q. Okay. Who -- I know you just shared that  
7 the -- there were professional learning with the Special  
8 Education division for the GNETS directors --

9 A. Mm-hmm.

10 Q. -- with Georgia State. Am I correct that you  
11 mentioned some FBA and some trauma-informed care  
12 structures?

13 A. Mm-hmm.

14 Q. Who were those for?

15 A. The GNETS directors.

16 Q. GNETS directors?

17 A. But they were also offered -- the FBA/BIP was  
18 offered to anyone, but the trauma-informed care was for  
19 GNETS directors?

20 Q. And what do you mean by "anyone"?

21 A. Anyone who signed up.

22 Q. With -- who is a teacher or --

23 A. I believe. I'm not -- I'm not for sure if  
24 teachers, but --

25 Q. Okay.

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1 A. -- maybe.

09:57AM

2 Q. Okay. Do you see where it reads: "Duties  
3 include providing technical assistance with strategic  
4 planning and implementation activities --

09:57AM

09:57AM

09:57AM

5 A. Mm-hmm.

09:57AM

6 Q. -- including presentation materials and  
7 mechanisms to ensure common standards of practice across  
8 the GNETS network are followed with fidelity"?

09:57AM

09:57AM

09:57AM

9 A. Yes.

09:57AM

10 Q. Okay. As GNETS program specialist, in what  
11 ways do you ensure common standards of practice across  
12 GNETS are followed with fidelity?

09:57AM

09:57AM

09:57AM

13 A. By reviewing the strategic plan.

09:57AM

14 Q. What kind of common standards are there?

09:57AM

15 MS. JOHNSON: Objection.

09:57AM

16 THE WITNESS: Whatever is within the  
17 strategic plan.

09:57AM

09:57AM

18 Q. BY MS. TUCKER: Okay. And we'll take a look at  
19 the strategic plan later.

09:57AM

09:58AM

20 So do you agree that there are common  
21 standards of practice across the GNETS network?

09:58AM

09:58AM

22 MS. JOHNSON: Objection.

09:58AM

23 THE WITNESS: There -- there are things  
24 within the strategic plan that all the GNETS are aware  
25 of.

09:58AM

09:58AM

09:58AM

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1	Q. BY MS. TUCKER: Okay. Do you think that common	09:58AM
2	standards of practices are important?	09:58AM
3	MS. JOHNSON: Objection.	09:58AM
4	THE WITNESS: I don't know.	09:58AM
5	Q. BY MS. TUCKER: As your time as special	09:58AM
6	education lead and teacher, you don't have an opinion on	09:58AM
7	whether common standards of practice are important?	09:58AM
8	MS. JOHNSON: Objection.	09:58AM
9	THE WITNESS: It can be.	09:58AM
10	Q. BY MS. TUCKER: Why is that?	09:58AM
11	A. I don't know.	09:59AM
12	Q. You're not sure --	09:59AM
13	A. I don't know.	09:59AM
14	Q. Okay. Do you know in what circumstances it	09:59AM
15	would be important?	09:59AM
16	A. No.	09:59AM
17	Q. Okay. But you do think that common standards	09:59AM
18	practices may be important?	09:59AM
19	A. They can be.	09:59AM
20	Q. They can be. Okay. Do you see the second	09:59AM
21	paragraph that starts, in that same box: "The GNETS	09:59AM
22	program specialist will provide oversight for compliance	10:00AM
23	with all requirements of federal regulations and State	10:00AM
24	Board rules applicable to students with disabilities?"	10:00AM
25	A. Yes.	10:00AM

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1 Q. Okay. As GNETS program specialist, in which 10:00AM  
2 ways do you provide oversight for compliance with 10:00AM  
3 federal regulations? 10:00AM

4 MS. JOHNSON: Objection. 10:00AM

5 THE WITNESS: (Witness examining document.) 10:00AM  
6 Oversight with compliance with federal -- oh, I see 10:00AM  
7 where it is. (Witness examining document.) 10:00AM

8 The only oversight I would say would be 10:00AM  
9 within the strategic plan. 10:00AM

10 Q. BY MS. TUCKER: Okay. Is the strategic plan 10:01AM  
11 aligned to federal regulations? 10:01AM

12 MS. JOHNSON: Objection. 10:01AM

13 THE WITNESS: I never pulled out the 10:01AM  
14 federal regulations and compared them, so I don't know. 10:01AM

15 Q. BY MS. TUCKER: Okay. So are you -- do you 10:01AM  
16 know what federal regulations this posting is referring 10:01AM  
17 to? 10:01AM

18 MS. JOHNSON: Objection. 10:01AM

19 THE WITNESS: I don't. 10:01AM

20 Q. BY MS. TUCKER: Do you work with federal 10:01AM  
21 regulations in your role as GNETS program specialist? 10:01AM

22 A. Within the -- what federal regulations? 10:01AM

23 Q. I'm asking you because it says the requirements 10:01AM  
24 of federal regulations. 10:01AM

25 MS. JOHNSON: Objection. 10:01AM

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1 THE WITNESS: I don't know. I have to sit 10:01AM  
2 and think about that. 10:01AM  
3 Q. BY MS. TUCKER: Okay. If you remember later, 10:01AM  
4 if you want to talk. 10:01AM  
5 A. (Nodding yes.) 10:01AM  
6 Q. So this sentence that we looked at also says 10:01AM  
7 "State Board rules," correct, that you provide oversight 10:01AM  
8 for compliance with State Board rules applicable to 10:02AM  
9 students with disabilities. Do you see that? 10:02AM  
10 A. I do. 10:02AM  
11 Q. Okay. What State Board rules? 10:02AM  
12 MS. JOHNSON: Objection. 10:02AM  
13 THE WITNESS: I don't know. I would have 10:02AM  
14 to think about that. 10:02AM  
15 Q. BY MS. TUCKER: You'd have to think about the 10:02AM  
16 State Board rules? 10:02AM  
17 A. Mm-hmm. I don't know. 10:02AM  
18 Q. Okay. Do you know which State Board rules it's 10:02AM  
19 referring to? 10:02AM  
20 A. I would have to think about that. 10:02AM  
21 Q. You'd have to think about that? 10:02AM  
22 A. (Nodding yes.) 10:02AM  
23 Q. Okay. Looking at this job description, is 10:02AM  
24 there anything identified that is inconsistent with your 10:02AM  
25 job duties as currently performed? 10:02AM

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1 A. I would have to sit and think about that. 10:02AM

2 Q. Okay. And I'm correct, I believe, that you 10:02AM

3 assumed this job in 20 -- October 2018. Does that sound 10:02AM

4 right? 10:02AM

5 A. Yes. 10:02AM

6 Q. Okay. Were you notified prior to October 2018 10:02AM

7 that you would be in this position? 10:02AM

8 A. No. 10:02AM

9 Q. Okay. 10:02AM

10 MS. TUCKER: I'd like the Court Reporter to 10:03AM

11 mark this document as Plaintiff's Exhibit 421. 10:03AM

12 (Plaintiff's Exhibit 421 marked for 10:03AM

13 identification.) 10:03AM

14 MS. TUCKER: Great. Thank you. 10:03AM

15 Q. BY MS. TUCKER: The Bates number on the first 10:03AM

16 page of this exhibit is GA00953298. 10:03AM

17 A. (Witness examining document.) 10:03AM

18 Q. This is an October 29th, 2019 e-mail from 10:03AM

19 Vickie Cleveland to you. The subject reads: 10:03AM

20 "Responsibilities." And there's one attachment. 10:03AM

21 Dr. Stevenson, do you recognize this e-mail 10:04AM

22 and attachment? 10:04AM

23 A. Yes. 10:04AM

24 Q. Okay. Let's turn to the attachment with -- at 10:04AM

25 the bottom. The Bates number reads GA00953299. The top 10:04AM

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1	of the document reads: "GNETS program specialist	10:04AM
2	responsibilities." And there's a box with bulleted	10:04AM
3	responsibilities.	10:04AM
4	Dr. Stevenson, did you create this	10:04AM
5	document?	10:04AM
6	A. I don't think so.	10:04AM
7	Q. Okay. Would you think that Vickie created it	10:04AM
8	since she sent it to you?	10:04AM
9	MS. JOHNSON: Objection.	10:05AM
10	THE WITNESS: I'm not sure. She -- she	10:05AM
11	sent it to me based on what this says, but I'm not sure	10:05AM
12	if she created it.	10:05AM
13	Q. BY MS. TUCKER: Okay. But you did receive this	10:05AM
14	from Vickie Cleveland?	10:05AM
15	A. That's what the e-mail says.	10:05AM
16	Q. And these are e-mails we received from the	10:05AM
17	State.	10:05AM
18	A. Okay.	10:05AM
19	Q. Okay. I'd love for you to take a look at the	10:05AM
20	document and responsibilities. And then would you agree	10:05AM
21	that it identifies your responsibilities as GNETS	10:05AM
22	program specialist?	10:05AM
23	A. Yes.	10:05AM
24	Q. Okay. It's quite a long list. I know you're	10:05AM
25	busy, but I'd like to go through them. Starting with	10:05AM



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1	the first bullet. "Provide consultation regarding	10:05AM
2	improvement on the GNETS strategic plan."	10:05AM
3	So you've mentioned the GNETS strategic	10:05AM
4	plan a few times. What is it?	10:05AM
5	A. It's a framework for the GNETS programs.	10:05AM
6	Q. Okay. All 24 regional programs?	10:05AM
7	A. Yes.	10:05AM
8	Q. Okay. In what ways do you provide consultation	10:06AM
9	regarding improvement on the GNETS strategic plan?	10:06AM
10	A. We always take a look at the strategic plan to	10:06AM
11	see what can be consolidated, if something is	10:06AM
12	repetitive, and just make changes as needed. If there	10:06AM
13	are any questions regarding any changes that were made	10:06AM
14	or when we do changes, if there's a training or a	10:06AM
15	presentation that needs to be completed, then I'll do	10:06AM
16	that.	10:06AM
17	Q. Okay. What type of changes would be made?	10:06AM
18	A. It just depends. We've made a few, so...	10:06AM
19	Q. Can you give me an example?	10:06AM
20	A. For example, we consolidated. It was seven	10:06AM
21	focused areas and we consolidated them into six, because	10:06AM
22	two of them had a lot of the same information.	10:07AM
23	Q. Okay. Got it. And do you also provide	10:07AM
24	consultation regarding improvement to the programs?	10:07AM
25	A. I don't provide consultation regarding	10:07AM

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1 improvement to the specific programs, no.

10:07AM

2 Q. Okay. And then do you see how this bullet --  
3 there's a few that are somewhat highlighted.

10:07AM

10:07AM

4 A. Yes.

10:07AM

5 Q. Do you see that?

10:07AM

6 A. (Nodding yes.)

10:07AM

7 Q. Do you know why this bullet is highlighted?

10:07AM

8 A. I do not.

10:07AM

9 Q. Next bullet: "Complete GNETS end-of-year  
10 reviews, provide ratings and feedback."

10:07AM

10:07AM

11 A. Yes.

10:07AM

12 Q. What are GNETS end-of-year reviews?

10:07AM

13 A. So the end-of-year reviews are the strategic  
14 plan reviews.

10:07AM

10:07AM

15 Q. Okay. And this is for the original GNETS  
16 programs?

10:07AM

10:07AM

17 A. Correct.

10:07AM

18 Q. Okay. Why is this bullet highlighted?

10:07AM

19 A. I have no idea.

10:07AM

20 Q. Okay. So how do you provide ratings?

10:07AM

21 A. Previously, we would go through each part of  
22 the strategic plan, face-to-face with the GNETS -- each  
23 of the GNETS directors, and they would provide evidence  
24 of their ratings and then we would provide feedback.

10:07AM

10:08AM

10:08AM

10:08AM

25 Q. What basis did you --

10:08AM

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1	A. There was a rubric.	10:08AM
2	Q. There was a rubric. Okay. And is this how you	10:08AM
3	still -- you mentioned that this is not how you do it	10:08AM
4	anymore?	10:08AM
5	A. We no longer provide a specific rating.	10:08AM
6	Q. When did that change?	10:08AM
7	A. I would have to think about it honestly.	10:08AM
8	Q. Okay. Do you think it was in the last two	10:08AM
9	years?	10:08AM
10	A. It was before COVID.	10:08AM
11	Q. Before COVID. Okay. So 2020 and prior?	10:08AM
12	A. Somewhere around there.	10:08AM
13	Q. Okay.	10:08AM
14	A. 2019, maybe 2020.	10:08AM
15	Q. Okay. Do you have a rubric still?	10:08AM
16	A. It's still a rubric, yeah.	10:08AM
17	Q. Okay. So if they're not ratings, what are	10:08AM
18	you --	10:08AM
19	A. It's not a numerical rating.	10:08AM
20	Q. Okay.	10:08AM
21	A. It's operational evident, not evident.	10:09AM
22	Q. So still a score?	10:09AM
23	A. It's not necessarily a score, but...	10:09AM
24	Q. What would you describe them as?	10:09AM
25	A. If it was a number, I would say it was a score.	10:09AM

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1	Q. Sure.	10:09AM
2	A. We can say rating.	10:09AM
3	Q. Rating. Okay.	10:09AM
4	A. Yeah. Non-numerical.	10:09AM
5	Q. A non-numerical rating?	10:09AM
6	A. Yes.	10:09AM
7	Q. Is this done in conjunction with anyone else at	10:09AM
8	GaDOE?	10:09AM
9	A. No.	10:09AM
10	Q. So you work on these ratings alone?	10:09AM
11	A. Vickie, myself, the directors are there, but no	10:09AM
12	one outside of myself and Vickie from GaDOE.	10:09AM
13	Q. Okay. Does anyone else in GaDOE see the	10:09AM
14	ratings?	10:09AM
15	A. No.	10:09AM
16	Q. Okay. Does anyone else see the feedback?	10:09AM
17	A. No.	10:09AM
18	Q. Okay. Let's move on to the next bullet.	10:09AM
19	"Assist GNETS PM with strategic plan improvement	10:09AM
20	initiatives." And then in parenthesis it reads:	10:09AM
21	"Editing, testing changes in the portal, conduct	10:10AM
22	trainings, et cetera."	10:10AM
23	A. Yes.	10:10AM
24	Q. Okay. The GNETS PM is Vickie; is that correct?	10:10AM
25	A. Correct.	10:10AM

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1 Q. Okay. Can you elaborate on your 10:10AM  
2 responsibilities associated with this bullet? 10:10AM

3 A. Within the portal -- the strategic plan is 10:10AM  
4 within the portal for the Georgia Department of 10:10AM  
5 Education, so if we make changes on the document, then 10:10AM  
6 it has to be changes in the portal. So I work with the 10:10AM  
7 IT team to make those changes within the portal so they 10:10AM  
8 reflect in the portal as well. 10:10AM

9 Q. Okay. And then it says "conduct trainings." 10:10AM  
10 What types of trainings do you conduct with regards to 10:10AM  
11 this bullet? 10:10AM

12 A. If we make any changes to the strategic plan, 10:10AM  
13 then I will create a PowerPoint or a document to show 10:10AM  
14 the directors the changes that were made. So it's not 10:10AM  
15 really necessarily a training, it's an update. 10:10AM

16 Q. Okay. So advising directors -- 10:10AM

17 A. Yes. 10:10AM

18 Q. -- on how to use the -- 10:10AM

19 A. Or advising them on what the updates were. 10:11AM

20 Q. Got it. How often does this happen? 10:11AM

21 A. Not often. I wouldn't be able to say every two 10:11AM  
22 months or three months, just whenever we get feedback, 10:11AM  
23 or there might need to be changes there made. But I 10:11AM  
24 wouldn't -- I wouldn't be able to say how often. 10:11AM

25 Q. Okay. And then who attends these trainings? 10:11AM

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1 A. GNETS directors.

10:11AM

2 Q. GNETS directors. Okay. The next bullet:

10:11AM

3 "Participate in facilities walkthroughs at GNETS

10:11AM

4 locations."

10:11AM

5 How often do you visit GNETS facilities?

10:11AM

6 A. Not -- I wouldn't be able to say monthly or  
7 weekly because it wasn't really. It was just whenever  
8 we scheduled them, we would go.

10:11AM

10:11AM

10:11AM

9 Q. Did you visit centers?

10:11AM

10 A. Yes.

10:11AM

11 Q. Did you visit school-based locations?

10:12AM

12 A. Yes.

10:12AM

13 Q. Okay. Who do you go with?

10:12AM

14 A. Vickie Cleveland.

10:12AM

15 Q. Okay. Do you ever go alone?

10:12AM

16 A. I have been, yes.

10:12AM

17 Q. Okay.

10:12AM

18 A. Not for walkthroughs.

10:12AM

19 Q. What have you been alone for?

10:12AM

20 A. I had to do two reviews alone.

10:12AM

21 Q. Do you mean strategic reviews?

10:12AM

22 A. Yes.

10:12AM

23 Q. Do you recall why you did them alone?

10:12AM

24 A. Vickie had the flu.

10:12AM

25 Q. When you go on these walkthroughs, what do you

10:12AM

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1 look for?

10:12AM

2 MS. JOHNSON: Objection.

10:12AM

3 THE WITNESS: When we schedule

10:12AM

4 walkthroughs, we're not necessarily looking for anything

10:12AM

5 in particular, just going to visit the centers and the

10:13AM

6 sites and putting -- what do you call it -- a face to a

10:13AM

7 name, because I've never been to all of them before,

10:13AM

8 so...

10:13AM

9 Q. BY MS. TUCKER: Have you been to all of them

10:13AM

10 now?

10:13AM

11 A. No.

10:13AM

12 Q. What determines when you schedule a

10:13AM

13 walkthrough?

10:13AM

14 A. We would just look at our calendars and say we

10:13AM

15 need to go to certain places, and we would try to make

10:13AM

16 sure to get as many in as possible.

10:13AM

17 Q. What was the need based on?

10:13AM

18 A. There wasn't any -- it wasn't based on any

10:13AM

19 particular need.

10:13AM

20 Q. So how did you and Vickie determine "We need to

10:13AM

21 go to this program?"

10:13AM

22 A. Well, sometimes it was based on when their

10:13AM

23 end-of-year review was, when we were doing those

10:13AM

24 face-to-face prior to COVID.

10:13AM

25 Q. Okay.

10:13AM

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1 A. So we would schedule them based on the end of  
2 the year review dates.

3 Q. Okay. Are these facilities walkthroughs  
4 separate from the strategic review?

5 A. Some.

6 Q. And some are not?

7 A. Yes.

8 Q. Okay. Do you and Vickie have a number that you  
9 like to visit each year?

10 A. No.

11 Q. At this point, how many other regional programs  
12 have you visited?

13 A. I would have to sit down and think about that.

14 Q. Okay. So if you -- I understand you'll go for  
15 strategic plan, but on what other basis would you  
16 schedule a walkthrough?

17 A. And when we say "walkthrough" --

18 Q. I'm looking at the bullet.

19 A. Yeah, I got it. It's literally -- sometimes,  
20 it's just a director might say, "You know, why don't you  
21 come check out our new calming room."

22 Q. Okay.

23 A. We'll go see that. It's just -- it's not  
24 necessarily to my -- that I can recall at this time,  
25 because, like I said, this is pre-COVID.



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1 Q. Okay.

10:15AM

2 A. So it's been a minute, so I can't really -- I  
3 don't really know.

10:15AM

10:15AM

4 Q. Have you done any walkthroughs this past school  
5 year?

10:15AM

10:15AM

6 A. Yes.

10:15AM

7 Q. Okay. And were those for reasons outside of  
8 the strategic plan?

10:15AM

10:15AM

9 A. Yes.

10:15AM

10 Q. What reasons were there, for example?

10:15AM

11 A. There was a new -- there was a change and a new  
12 codirector was at a program, so we just wanted to go  
13 welcome them and see -- we hadn't been out since COVID,  
14 so --

10:15AM

10:15AM

10:15AM

10:16AM

15 Q. Okay.

10:16AM

16 A. -- we were trying to get our feet back out  
17 there a little bit.

10:16AM

10:16AM

18 Q. About when did you -- would you say that you  
19 started going back to the schools?

10:16AM

10:16AM

20 A. It's only been one.

10:16AM

21 Q. Which one?

10:16AM

22 A. Coastal.

10:16AM

23 Q. Coastal. And just to make sure I understand,  
24 you've only been to one this school year or since --

10:16AM

10:16AM

25 A. This school year.

10:16AM

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1 Q. Okay. And by "this school year," we mean the  
2 2022 to 2023 school year?

3 A. Yes.

4 Q. Okay.

5 A. Which started in August.

6 Q. Yes. Thank you. Did you visit any during the  
7 2021/2022 school year, so last school year?

8 A. No.

9 Q. Did Vickie?

10 A. I don't know.

11 Q. Let's look at the next bullet. "Attend  
12 IDT/DBHDD meetings."

13 A. Yes.

14 Q. What does the IDT mean?

15 A. Interagency Departmental Team.

16 Q. Okay.

17 A. It's a make up of different agencies that come  
18 together once a month to discuss different initiatives  
19 for children. So different Children's Healthcare of  
20 Atlanta, Georgia State, just different agencies.

21 Q. What agencies -- what State agencies are  
22 present?

23 A. I don't know outside of Georgia Department of  
24 Ed. I'm not sure.

25 Q. Is GNETS discussed at these meetings?

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1	A. No.	10:17AM
2	Q. Does anyone else attend for GaDOE?	10:17AM
3	A. I'm not sure. I know I've attended and Vickie.	10:17AM
4	There have been some others, but I don't know. I	10:17AM
5	couldn't tell you who in what department.	10:17AM
6	Q. Do you and Vickie attend together?	10:17AM
7	A. Not all the time.	10:17AM
8	Q. Okay. It says attend also DBHDD meetings?	10:17AM
9	A. It's the same thing.	10:18AM
10	Q. Oh, it's --	10:18AM
11	A. For me it's --	10:18AM
12	Q. Okay.	10:18AM
13	A. DBHDD is the arm that kind of facilitates the	10:18AM
14	IDT.	10:18AM
15	Q. Okay. So DBHDD is one of the State agencies	10:18AM
16	that participates in the IDT?	10:18AM
17	A. I would think, yeah. Yes.	10:18AM
18	Q. Okay. Let's look at the next bullet. "Attend	10:18AM
19	program manager weekly meetings."	10:18AM
20	A. Yes.	10:18AM
21	Q. What does this mean?	10:18AM
22	A. Vickie and I meet weekly.	10:18AM
23	Q. Okay. Does anyone else attend these meetings?	10:18AM
24	A. Not mostly, no.	10:18AM
25	Q. Why would someone else attend the meeting?	10:18AM

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1	A. If we needed an update about something, maybe.	10:18AM
2	Q. Do you communicate more often than weekly?	10:18AM
3	A. Yes.	10:18AM
4	Q. Would you say you communicate with Vickie	10:18AM
5	daily?	10:18AM
6	A. Yes -- well, at least three days a week.	10:18AM
7	Q. And then for these weekly meetings, is there an	10:19AM
8	agenda?	10:19AM
9	A. Not always, no.	10:19AM
10	Q. Do you set it or does Vickie?	10:19AM
11	A. Vickie.	10:19AM
12	Q. Next it says: "Attend SPED bimonthly	10:19AM
13	department meetings." What is that referring to?	10:19AM
14	A. Within the Special Education division at the	10:19AM
15	Georgia Department of Education we have monthly or	10:19AM
16	bimonthly meetings.	10:19AM
17	Q. So would this be attended by everyone within	10:19AM
18	the Special Education division?	10:19AM
19	A. Yes.	10:19AM
20	Q. Okay. Who leads these meetings?	10:19AM
21	A. It just depends. If the director is there, the	10:19AM
22	director will. If not, then a senior program manager	10:19AM
23	will.	10:19AM
24	Q. Is GNETS discussed?	10:19AM
25	A. We -- (coughing). Excuse me.	10:20AM

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1	Q. No problem.	10:20AM
2	A. Not really, no.	10:20AM
3	Q. Has it ever been discussed?	10:20AM
4	A. Discussed as in what?	10:20AM
5	Q. As an agenda item out of SPED bimonthly	10:20AM
6	department meetings, has GNETS ever been raised?	10:20AM
7	A. Possibly, but I don't specifically remember.	10:20AM
8	Q. Have --	10:20AM
9	A. In what way?	10:20AM
10	Q. Have you ever had to present or speak about	10:20AM
11	GNETS during one of these meetings?	10:20AM
12	A. Not that I recall.	10:20AM
13	Q. The next bullet: "Collaborate with DLs on	10:20AM
14	GNETS findings." And then in parenthesis it reads:	10:20AM
15	"CFM visits, provide feedback if needed."	10:20AM
16	A. Mm-hmm.	10:20AM
17	Q. There are a few abbreviations here?	10:20AM
18	A. Mm-hmm.	10:20AM
19	Q. Could you go through them with me?	10:20AM
20	A. Yes. DLs are District Liaisons.	10:20AM
21	Q. Okay. What does that mean?	10:21AM
22	A. They're the program specialists for RDA, who we	10:21AM
23	said earlier --	10:21AM
24	Q. Okay.	10:21AM
25	A. -- we referred to them as District Liaisons.	10:21AM

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1 Q. Got it. Okay. And then what's a CFM visit? 10:21AM

2 A. Cross Functional Monitoring, which is a part of 10:21AM  
3 the Results-Driven Accountability unit, which is 10:21AM  
4 monitoring of special Ed compliance for the LEAs. The 10:21AM  
5 DLs do that monitoring. 10:21AM

6 Q. Okay. So what is meant by GNETS findings 10:21AM  
7 during one of these CFM visits? 10:21AM

8 A. Within the Cross Functional Monitoring the -- 10:21AM  
9 they pull folders, and two GNETS folders are pulled. 10:21AM

10 Q. And what do you mean by folders? Student's 10:21AM  
11 folders? 10:21AM

12 A. Compliance. Whatever is in there, compliance 10:21AM  
13 reviews. 10:22AM

14 Q. And what do they look for? 10:22AM

15 A. I'm not quite sure but I just know two GNETS 10:22AM  
16 files are pulled within that. 10:22AM

17 Q. And is this what you did when you were in the 10:22AM  
18 RDA? 10:22AM

19 A. We didn't -- I didn't start with the Cross 10:22AM  
20 Functional Monitoring. 10:22AM

21 Q. Okay. But you've collaborated with them on 10:22AM  
22 GNETS findings? 10:22AM

23 A. I wouldn't necessarily say collaborate. If 10:22AM  
24 they had a question, then they would ask. 10:22AM

25 Q. Just to make sure I understand, can you give me 10:22AM

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1 an example of what type of question it would be? 10:22AM

2 A. I would have to think about that. 10:22AM

3 Q. Okay. Would you agree that you've answered 10:22AM  
4 questions from DLs on GNETS findings consistent with 10:22AM  
5 this bullet? 10:22AM

6 A. I would -- if they are -- I guess, if they 10:22AM  
7 asked. 10:22AM

8 Q. But you have not done that? 10:22AM

9 A. If they asked. 10:22AM

10 Q. Right. I understand. But during your time as 10:22AM  
11 GNETS program specialist, have you been asked? 10:23AM

12 A. I would have to think about that. 10:23AM

13 Q. Let's move to the next bullet. "Develop and 10:23AM  
14 conduct trainings in collaboration with the GNETS PM for 10:23AM  
15 stakeholders." In parenthesis, "i.e. SELDA Charter 10:23AM  
16 School, etcetera." 10:23AM

17 A. Mm-hmm. 10:23AM

18 Q. Who would you define as stakeholders referred 10:23AM  
19 to here? 10:23AM

20 A. Individuals within SELDA and Charter schools. 10:23AM

21 Q. Okay. And what is SELDA? 10:23AM

22 A. That is a good question. I know who they are. 10:23AM

23 Q. Okay. 10:23AM

24 A. I think I know what SELDA means. 10:23AM

25 Q. Okay. Do you want to tell me who they are? 10:23AM

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1 A. Special Education Leadership and Development  
2 Academy.

3 Q. Okay. And is that with GaDOE?

4 A. No. That is any new special ed director for  
5 the State of Georgia, they attend SELDA.

6 Q. So is it -- would it be a training?

7 A. They provide monthly, like, things new  
8 directors need to know. You should know this, this  
9 month we're going over this, this is important, yadda,  
10 yadda, yadda.

11 Q. And then what type of training have you  
12 developed for these stakeholders?

13 A. In collaboration with the GNETS program  
14 manager?

15 Q. In collaboration with Vickie?

16 A. Just a broad overview of GNETS and that's about  
17 it.

18 Q. A broad overview of GNETS?

19 A. Mm-hmm.

20 Q. And then I know you explained SELDA. When  
21 would you also do this to charter schools?

22 A. Charter schools, if the district's liaison, who  
23 works with the charter schools, asked us to come do a  
24 broad overview for charter schools about GNETS, then we  
25 would.



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1 Q. Okay. Would it be a similar training to what 10:25AM  
2 you just described for SELDA or would it be targeted for 10:25AM  
3 both? 10:25AM  
4 A. No. It would be -- it would be the same. 10:25AM  
5 Q. Okay. Why is this bullet highlighted? 10:25AM  
6 A. I do not know. 10:25AM  
7 Q. Next is: "Collaborate with GLRS PM on GNETS 10:25AM  
8 reintegration." Those are some more abbreviations. 10:25AM  
9 What is GLRS PM? 10:25AM  
10 A. Georgia -- why don't I know what that is. 10:25AM  
11 Q. Well, do you know what they do? 10:25AM  
12 A. I know what they do. 10:25AM  
13 Q. You want to -- let's talk about that. 10:25AM  
14 A. They're within the RESA. 10:25AM  
15 Q. Okay. 10:25AM  
16 A. And they provide trainings and supports 10:25AM  
17 specifically for special education within those RESAs. 10:25AM  
18 Q. With the RESAs. Okay. Thank you. And then 10:25AM  
19 what is meant here by GNETS reintegration? 10:26AM  
20 A. Assisting students as they transition back. 10:26AM  
21 Q. As they transition back where? 10:26AM  
22 A. Reintegrating back to their home school or 10:26AM  
23 school environment. 10:26AM  
24 Q. Okay. What does this collaboration look like? 10:26AM  
25 A. I didn't really do as much collaboration. That 10:26AM

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1 was more Vickie.

10:26AM

2 Q. Has Vickie talked to you about this work with  
3 the GLRS from the RESA?

10:26AM

10:26AM

4 A. Somewhat.

10:26AM

5 Q. But you're not involved?

10:26AM

6 A. Not really.

10:26AM

7 Q. Do you do any work related to GNETS

10:26AM

8 reintegration in your role as GNETS program specialist?

10:27AM

9 A. We address it within the strategic plan.

10:27AM

10 Q. The next bullet reads: "Attend and assist in  
11 planning and conducting training at LEA collaborative  
12 meetings."

10:27AM

10:27AM

10:27AM

13 A. I have not attended a LEA collaborative. That  
14 was before my time, and they didn't -- and then COVID  
15 happened, so...

10:27AM

10:27AM

10:27AM

16 Q. The next: "I-Ready, monitor." Actually,  
17 before we move on with the LEA collaborative, I know you  
18 mentioned you didn't attend them because of COVID, do  
19 you know if they're still happening?

10:27AM

10:27AM

10:27AM

10:27AM

20 A. I have no idea.

10:27AM

21 Q. Moving on to i-Ready, the next bullet:

10:27AM

22 "I-Ready, monitor reports, collaborate with GNETS vendor  
23 on data reporting."

10:27AM

10:27AM

24 A. Mm-hmm.

10:27AM

25 Q. What is i-Ready?

10:27AM

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1 A. I-Ready is a supplemental program for reading  
2 and math, and it's all computer-based.

3 Q. And what do you look for in these reports that  
4 you monitor?

5 A. We monitor the amount of time spent, and if  
6 there's any growth on reading and math.

7 Q. And this is by an individual student?

8 A. No. By program.

9 Q. And how often do you look at these reports?

10 A. Monthly.

11 Q. And then how would you collaborate with the  
12 GNETS and vendor on the reporting?

13 A. We -- well, with the specific programs, I don't  
14 necessarily collaborate on the reports, but if they have  
15 a student -- if a student moves from one GNETS to the  
16 another, and they need to make that change, then I'll  
17 make the change for them. If they have a question about  
18 anything regarding their reports or technical issues,  
19 then I'll answer those.

20 Q. What type of questions have come up?

21 A. I can't see a student, why not, I thought you  
22 transferred them. Or the student is not showing up  
23 although you transferred them, what do I need to do.

24 Q. Got it. But the reports are not individual,  
25 but there's questions on an individual basis?

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1 A. No. The -- they get their own individual 10:29AM  
2 reports. They can see their own reports with their 10:29AM  
3 students. 10:29AM

4 Q. Mm-hmm. 10:29AM

5 A. I look at the reports from a program 10:29AM  
6 perspective -- 10:29AM

7 Q. Got it. 10:29AM

8 A. -- not from a specific student perspective. 10:29AM

9 Q. Thank you for that clarification. 10:29AM

10 A. Mm-hmm. 10:29AM

11 Q. A moment ago you said that you look for both 10:29AM  
12 progress? 10:29AM

13 A. For that program as a whole, not individual 10:30AM  
14 students. 10:30AM

15 Q. And then what do you -- how is that measured? 10:30AM

16 A. It's metrics set within i-Ready. 10:30AM

17 Q. If you see regional GNETS program that is 10:30AM  
18 declining instead of growing, do you take any steps? 10:30AM

19 A. We reach out to them and ask them have they 10:30AM  
20 looked at their reports. 10:30AM

21 Q. Has that happened? 10:30AM

22 A. It has before, yes. 10:30AM

23 Q. And do you then work with them to change that? 10:30AM

24 MS. JOHNSON: Objection. 10:30AM

25 THE WITNESS: No. 10:30AM

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1 Q. BY MS. JOHNSON: Okay. If the next month, if 10:30AM  
2 they're still going down, would you contact them again? 10:30AM

3 A. Well, you would need to give them more than a 10:30AM  
4 month. 10:31AM

5 Q. Okay. 10:31AM

6 A. So -- and then since COVID, it's been so crazy 10:31AM  
7 with everything as far as some kids not coming back, 10:31AM  
8 some kids not having access, so... 10:31AM

9 Q. Since COVID, are you still doing the 10:31AM  
10 monitoring? 10:31AM

11 A. We still get the reports monthly. 10:31AM

12 Q. And you still connect with the regional GNETS 10:31AM  
13 programs, if you see a decline in growth? 10:31AM

14 A. Well, there are benchmarks, so you wouldn't 10:31AM  
15 contact them monthly anyway. 10:31AM

16 Q. Okay. 10:31AM

17 A. There are different benchmarks set and the 10:31AM  
18 student takes different diagnostics. 10:31AM

19 Q. Uh-hum. 10:31AM

20 A. So it depends on the diagnostics. But all we 10:31AM  
21 do is just let them know, or they have access to the 10:31AM  
22 same reports that I have, so they're aware of their own 10:31AM  
23 data. 10:31AM

24 Q. And -- 10:31AM

25 A. They're aware of their own data. 10:31AM

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1	Q. They're aware of their own data?	10:31AM
2	A. Mm-hmm.	10:31AM
3	Q. But you also reach out?	10:31AM
4	A. On occasion.	10:31AM
5	Q. Okay. Do you reach out if it's stagnant growth	10:31AM
6	as well?	10:32AM
7	A. I would have to think about that.	10:32AM
8	Q. Okay. Let's move to the next bullet: "Monitor	10:32AM
9	social worker logs, provide updates to the GNETS PM."	10:32AM
10	Can you tell me more about this bullet?	10:32AM
11	A. There are 11 programs that receive a	10:32AM
12	therapeutic grant for a social worker, and they're	10:32AM
13	required or they are asked to submit social worker logs	10:32AM
14	monthly.	10:32AM
15	Q. This therapeutic grant, is it through GaDOE?	10:32AM
16	A. Yes.	10:32AM
17	Q. And 11 of the 24 programs receive it?	10:32AM
18	A. Yes.	10:32AM
19	Q. How do they share this information with you?	10:32AM
20	A. Through the portal.	10:32AM
21	Q. Do you share -- what would you share as updates	10:33AM
22	with Vickie Cleveland?	10:33AM
23	A. The programs that haven't submitted their logs,	10:33AM
24	and I do a summary at the end of the year.	10:33AM
25	Q. Okay. For all 11?	10:33AM

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1 A. Well, it's a combined summary. 10:33AM

2 Q. What does the summary entail? 10:33AM

3 A. The average number of students who receive 10:33AM  
4 support and the most common types of support that are 10:33AM  
5 received. 10:33AM

6 Q. What is the purpose of this report? 10:33AM

7 A. Just to have a overview of the logs for the 10:33AM  
8 year. The summary. 10:33AM

9 Q. Do you take any actions based on that summary? 10:33AM

10 A. There are no actions to take based on the 10:33AM  
11 summary. It's just them reporting therapeutic support 10:33AM  
12 that the social worker has provided to the students. 10:33AM

13 Q. Do you and Vickie make suggestions based on -- 10:33AM

14 A. No. 10:34AM

15 Q. I'll just finish it for the record. Do you and 10:34AM  
16 Vickie make suggestions based on the summaries? 10:34AM

17 A. No. 10:34AM

18 Q. Do you monitor logs of any other types of 10:34AM  
19 service providers? 10:34AM

20 A. I do not. 10:34AM

21 Q. Is the report a condition of the grant? 10:34AM

22 MS. JOHNSON: Objection. Excuse me. 10:34AM

23 THE WITNESS: I've never been made aware of 10:34AM  
24 that so I don't know. 10:34AM

25 Q. BY MS. JOHNSON: Let's move to the next bullet. 10:34AM

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1 "Collaborate with GO-IEP team on pending changes in the 10:34AM  
2 portal." 10:34AM  
3 A. Yes. 10:34AM  
4 Q. I know earlier you mentioned GO-IEP, but can 10:34AM  
5 you explain it to me? 10:34AM  
6 A. Georgia IEP is a statewide IEP program. 10:34AM  
7 Q. Is Georgia IEP the same as GO-IEP? 10:34AM  
8 A. It is. 10:34AM  
9 Q. Okay. And how do you collaborate with the 10:34AM  
10 GO-IEP team? 10:34AM  
11 A. As they make updates specific to GNETS, they'll 10:34AM  
12 reach out. 10:35AM  
13 Q. The next one: "Co-facilitate GNETS directors 10:34AM  
14 meetings." 10:35AM  
15 A. Yes. 10:35AM  
16 Q. All right. In this bullet it identifies those 10:35AM  
17 meetings with regional GNETS program directors? 10:35AM  
18 A. Correct. 10:35AM  
19 Q. How often? 10:35AM  
20 A. Usually monthly, if not every other month. 10:35AM  
21 Q. Who do you co-facilitate with? 10:35AM  
22 A. I co-facilitate with Vickie Cleveland. 10:35AM  
23 Q. Who sets the agenda? 10:35AM  
24 A. Vickie Cleveland. 10:35AM  
25 Q. Do you discuss that with her in advance? 10:35AM



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1 A. Yes.

10:35AM

2 Q. And then are these meetings in-person?

10:35AM

3 A. Virtual, since COVID.

10:35AM

4 Q. In the past, have they been in-person?

10:35AM

5 A. They have been, yes.

10:35AM

6 Q. And what is --

10:35AM

7 A. We did both.

10:35AM

8 Q. I apologize.

10:35AM

9 A. Both virtual and in-person, even before COVID.

10:35AM

10 Q. Okay. Does that mean that some people are  
11 in-person and some people are virtual?

10:35AM

10:35AM

12 A. No. Sometimes we'll have all in-person and  
13 sometimes we would have all virtual, but that was  
14 pre-COVID.

10:35AM

10:36AM

10:36AM

15 Q. Got it. So you were Zooming before -- before  
16 we all were?

10:36AM

10:36AM

17 A. Yes.

10:36AM

18 Q. What is your role during these meetings?

10:36AM

19 A. To do the PowerPoint.

10:36AM

20 Q. Is the PowerPoint -- what is the PowerPoint for  
21 the meetings, is it the agenda or is it a different  
22 topic?

10:36AM

10:36AM

10:36AM

23 A. There are different presentations, different  
24 presenters every month. And so if they have a

10:36AM

10:36AM

25 PowerPoint, I'll combine the PowerPoints and just do the

10:36AM

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1 presentation, and then just provide reminders of 10:36AM

2 anything that might need to be reminded about. 10:36AM

3 Q. Okay. "Advice GNETS staff and stakeholders on 10:36AM

4 State Board rules for GNETS." 10:36AM

5 A. Mm-hmm. 10:36AM

6 Q. Do you recall what State Board rules this 10:36AM

7 bullet is referring to? 10:36AM

8 A. The GNETS State Board rules. 10:35AM

9 Q. And then this -- it looks like this bullet is 10:37AM

10 plural. Is there another -- oh, no, it's State Board 10:37AM

11 rule. It's singular. I apologize. 10:37AM

12 Which GNETS staff do you advise on the 10:37AM

13 State Board rule? 10:37AM

14 A. I mean, we'll -- we might have the State Board 10:37AM

15 rule as a part of the presentation, so that's as much 10:37AM

16 advising as I would say for me. 10:37AM

17 Q. And the presentation is to the GNETS directors? 10:37AM

18 A. Yes. 10:37AM

19 Q. Do you ever present to other folks at regional 10:37AM

20 GNETS programs? 10:37AM

21 A. Other folks like who? 10:37AM

22 Q. Teachers -- 10:37AM

23 A. No. I never interact with the teachers. 10:37AM

24 Q. And what do you-all advise related to State 10:37AM

25 Board rules and the presentation? 10:37AM

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1	A. I don't know.	10:37AM
2	Q. What is in the presentation?	10:37AM
3	A. For me?	10:38AM
4	Q. Yes.	10:38AM
5	A. I just might review it as far as going through	10:38AM
6	it, but I don't advise anyone.	10:38AM
7	Q. Got it. I just --	10:38AM
8	A. And you know -- yeah.	10:38AM
9	Q. Please go ahead.	10:38AM
10	A. No. I'm good.	10:38AM
11	Q. Okay. So would you disagree with that bullet?	10:38AM
12	A. Maybe the word advise.	10:38AM
13	Q. What stakeholders would you present to on the	10:38AM
14	GNETS rules?	10:38AM
15	A. It just depends on who the audience is at that	10:38AM
16	time, outside of the GNETS directors. Whoever we might	10:38AM
17	be doing a presentation for at that time.	10:38AM
18	Q. What audiences have you presented to?	10:38AM
19	A. The charter schools, SELDA.	10:38AM
20	Q. Okay. So I know earlier when you mentioned the	10:39AM
21	charter school and SELDA, I believe you talked about a	10:39AM
22	GNETS overview.	10:39AM
23	A. Mm-hmm. The State Board rule is within that	10:39AM
24	overview.	10:39AM
25	Q. Thank you for that clarification.	10:39AM

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1	A. Mm-hmm.	10:39AM
2	Q. The next: "Analysis staffing and budget data	10:39AM
3	for GNETS in collaboration with the GNETS PM."	10:39AM
4	A. Mm-hmm.	10:39AM
5	Q. What type of work do you do analyzing and	10:39AM
6	staffing budget data for GNETS?	10:39AM
7	A. I really don't do a lot of that.	10:39AM
8	Q. Do you do anything?	10:39AM
9	A. She might show me so I can try to understand	10:39AM
10	it, but that's about it.	10:39AM
11	Q. "Assess GNETS PM in conducting GNETS	10:39AM
12	stakeholder meetings."	10:39AM
13	A. Mm-hmm.	10:39AM
14	Q. I know we discussed a few, are there any other	10:39AM
15	stakeholders that we have not discussed?	10:39AM
16	A. I'm not sure. The ones that I can think of are	10:39AM
17	the ones I've mentioned.	10:39AM
18	Q. And then the last bullet: "Research	10:39AM
19	therapeutic programming and other SEA/school districts	10:39AM
20	to inform GNETS programming."	10:40AM
21	A. Mm-hmm.	10:40AM
22	Q. Earlier we agreed SEA is the State Education	10:40AM
23	Agency, right?	10:40AM
24	A. Yes.	10:40AM
25	Q. What is meant by research therapeutic	10:40AM

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1 programming and other SEA school districts to inform  
2 GNETS programing?

10:40AM

10:40AM

3 A. Just to do research and see what other states  
4 are doing.

10:40AM

10:40AM

5 Q. In what ways, what are you researching in those  
6 states?

10:40AM

10:40AM

7 A. I mean, just to see just how I would, as far as  
8 special education, how are they implementing co-teaching  
9 in other states, how are they implementing therapeutic  
10 support in other states. So just kind of that research.

10:40AM

10:40AM

10:40AM

10:40AM

11 Q. Have you suggested changes based on your  
12 research?

10:40AM

10:40AM

13 A. I've had conversations of what I've found, but  
14 that's about it.

10:40AM

10:40AM

15 Q. With Vickie?

10:40AM

16 A. Mm-hmm.

10:40AM

17 Q. Anyone else?

10:40AM

18 A. No.

10:40AM

19 Q. Has Vickie suggested that there be changes  
20 based on your research?

10:40AM

10:41AM

21 A. Not that I -- I don't recall having that  
22 conversation.

10:41AM

10:41AM

23 Q. Do you also compare staff levels, at these  
24 other states, what they're doing?

10:41AM

10:41AM

25 MS. JOHNSON: Object.

10:41AM

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1 THE WITNESS: I wouldn't have that 10:41AM  
2 information as that specific, as to what kind of staff 10:41AM  
3 they would have at other states. 10:41AM

4 Q. BY MS. JOHNSON: Okay. So this chart is from 10:41AM  
5 October 2019. If we go back to the front e-mail, it's 10:41AM  
6 now September 2022. Are there responsibilities that 10:41AM  
7 have been added? 10:41AM

8 A. I would have to think about that. 10:41AM

9 Q. Is there anything off the top of your mind that 10:41AM  
10 you know that you do often that isn't on here? 10:41AM

11 A. I would honestly have to sit and make a list to 10:41AM  
12 think about that. 10:41AM

13 Q. Have any been taken away? 10:41AM

14 A. Same. I would have to think about it. 10:42AM

15 Q. Okay. Have you received charts from Vickie 10:42AM  
16 Cleveland after this that looked, you know, have GNETS 10:42AM  
17 programs specialist responsibilities at the top end of 10:42AM  
18 box? Is there something that you receive every so 10:42AM  
19 often? 10:42AM

20 A. I don't know. 10:42AM

21 Q. Are your responsibilities communicated to you 10:42AM  
22 in a different way? 10:42AM

23 A. I don't know. 10:42AM

24 Q. You don't know how your responsibilities are 10:42AM  
25 communicated to you? 10:42AM

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1 A. I mean, it's not a conversation that's had  
2 everyday or every month.

3 Q. Sure.

4 A. So as things come up and they need to be done,  
5 if I'm asked to do them as a part of my job, I do.

6 Q. Do you currently work on any matters not  
7 related to GNETS?

8 A. No.

9 Q. Do you know if anyone held the role of GNETS  
10 program specialist before you?

11 A. I do not.

12 Q. You don't -- do you not know?

13 A. I don't know.

14 Q. Okay. Who have you worked with at the GaDOE,  
15 while GNETS program specialist, in addition to Vickie  
16 Cleveland?

17 A. Worked with in what way?

18 Q. Have you coordinated or collaborated with in  
19 your work?

20 A. I've collaborated with a lot of people.

21 Q. A lot of people?

22 A. (Nodding yes.)

23 Q. Okay. I'm going to go through a few folks  
24 then.

25 A. (Nodding yes.)

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1	Q. Do you -- have you worked with Matt Jones?	10:43AM
2	A. No.	10:43AM
3	Q. You have not worked with Matt Jones?	10:43AM
4	A. (Nodding no.)	10:43AM
5	Q. Have you communicated with him?	10:43AM
6	A. I have not.	10:43AM
7	Q. How often have you communicated or worked with	10:44AM
8	Shawn Owen?	10:44AM
9	A. I don't work with Shawn but I've communicated	10:44AM
10	with Shawn, if she was on a meeting that I was on with	10:44AM
11	Vickie, but that's not often.	10:44AM
12	Q. What matters have you and Vickie communicated	10:44AM
13	with Shawn Owen about?	10:44AM
14	A. I mean, just GNETS updates.	10:44AM
15	Q. And what's Shawn's role?	10:44AM
16	A. Deputy.	10:44AM
17	Q. Of?	10:44AM
18	A. Federal Programs.	10:44AM
19	Q. Is that within Special Education?	10:44AM
20	A. No. Special Education is within Federal	10:44AM
21	Programs.	10:44AM
22	Q. How about Winter Lowe?	10:44AM
23	A. She's a State director.	10:44AM
24	Q. Have you communicated with her in your role as	10:44AM
25	GNETS program specialist?	10:44AM



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1	A. I've been in meetings with Vickie and Winter.	10:44AM
2	Q. Okay. On what matters?	10:44AM
3	A. GNETS updates.	10:44AM
4	Q. What about Jerrano Bell (phonetic)?	10:44AM
5	A. Jerrano?	10:45AM
6	Q. Jerrano. I apologize.	10:45AM
7	A. I've been in meetings with Vickie when she's	10:45AM
8	with Jerrano.	10:45AM
9	Q. What is Jerrano's role?	10:45AM
10	A. I just know he does the budget.	10:45AM
11	Q. Have you communicated with Jerrano separate	10:45AM
12	from Vickie?	10:45AM
13	A. If she asks me to, but not me initiating,	10:45AM
14	unless Vickie asks me to.	10:45AM
15	Q. And that would be related to the budget?	10:45AM
16	A. Yes, because I don't do budget.	10:45AM
17	Q. How about Amber McCallum?	10:45AM
18	A. I don't really communicate with Amber.	10:45AM
19	Q. What --	10:45AM
20	A. That's more Vickie.	10:45AM
21	Q. What does she work on?	10:45AM
22	A. Budget.	10:45AM
23	Q. Earlier you mentioned a Linda Castellanos?	10:45AM
24	A. Mm-hmm.	10:45AM
25	Q. Do you work with her on your role as GNETS	10:45AM

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1 program specialist?

10:45AM

2 A. If it's GO-IEP because she's a GO-IEP program  
3 manager.

10:45AM

10:45AM

4 Q. How often would you say you communicate with  
5 Linda Castellanos?

10:45AM

10:45AM

6 A. Not often. But she was my previous program  
7 manager in that role with her.

10:45AM

10:45AM

8 Q. So you -- if you were to communicate with her,  
9 it's about GO-IEP?

10:45AM

10:45AM

10 A. It's about -- yeah, anything specific to GNETS  
11 and GO-IEP.

10:46AM

10:46AM

12 Q. What about Mike Rowland?

10:46AM

13 A. No.

10:46AM

14 Q. Do you know Mike Rowland?

10:46AM

15 A. He's over at facilities. I've heard Vickie  
16 mention his name.

10:46AM

10:46AM

17 Q. So earlier we spoke about how you have the  
18 weekly meetings with Vickie?

10:46AM

10:46AM

19 A. Mm-hmm.

10:46AM

20 Q. Is Vickie exclusively working on GNETS?

10:46AM

21 MS. JOHNSON: Objection.

10:46AM

22 THE WITNESS: I don't know.

10:46AM

23 Q. BY MS. JOHNSON: Is there any work that you  
24 perform related to GNETS that Vickie Cleveland does not  
25 oversee?

10:46AM

10:46AM

10:46AM

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1	A. No.	10:46AM
2	Q. Do you think it would be helpful for your team	10:46AM
3	to expand?	10:46AM
4	MS. JOHNSON: Objection.	10:46AM
5	THE WITNESS: I don't know.	10:46AM
6	Q. BY MS. TUCKER: You don't know?	10:46AM
7	A. Mm-hmm.	10:46AM
8	Q. Do you participate in regular meetings at	10:46AM
9	GaDOE? Do you participate in, like, a Special Education	10:46AM
10	division meeting?	10:47AM
11	A. Yes. That's the department meetings.	10:47AM
12	Q. Okay. Got it. And those were bimonthly?	10:47AM
13	A. Mm-hmm.	10:47AM
14	Q. Okay. And then do you participate in Federal	10:47AM
15	Programs meetings?	10:47AM
16	A. Those are monthly.	10:46AM
17	Q. Monthly meetings?	10:47AM
18	A. (Nodding yes.)	10:47AM
19	Q. Who attends the Federal Programs meetings?	10:47AM
20	A. Everybody in Federal Programs, so over 200	10:47AM
21	people.	10:47AM
22	Q. And those are monthly?	10:47AM
23	A. (Nodding yes.)	10:47AM
24	Q. Would those be facilitated by Shawn?	10:47AM
25	A. For the most part. If she's absent, then	10:47AM

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1 someone else will.

10:47AM

2 Q. Okay. And then meetings with the Georgia

10:47AM

3 Learning Resource System, is that GLRS?

10:47AM

4 A. Mm-hmm.

10:47AM

5 Q. Okay. And how often do you meet with them?

10:47AM

6 A. I don't meet with them.

10:47AM

7 Q. Do you meet ever with the State Board of

10:47AM

8 Education?

10:47AM

9 A. No.

10:47AM

10 Q. Have you ever met with the State Board of

10:47AM

11 Education ever?

10:47AM

12 A. I never met -- I've sat in on a meeting, but

10:47AM

13 I've never presented or said anything.

10:47AM

14 Q. Got it. Have you attended any other state

10:48AM

15 leadership meetings?

10:48AM

16 A. No.

10:48AM

17 Q. Have you ever sat in on a meeting with the

10:48AM

18 superintendent?

10:48AM

19 A. No.

10:48AM

20 Q. Are there other regular meetings you have in

10:48AM

21 your role that I haven't mentioned?

10:48AM

22 A. IDT. Besides IDT, no.

10:48AM

23 Q. IDT. Okay. And the regional director meetings

10:48AM

24 are monthly?

10:48AM

25 A. Yes.

10:48AM

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1 Q. Do you --

10:48AM

2 A. Almost.

10:48AM

3 Q. Almost?

10:48AM

4 A. (Nodding yes.)

10:48AM

5 Q. Do you meet with the RESAs regularly?

10:48AM

6 A. No. I don't meet with them at all.

10:48AM

7 Q. You've never met with them?

10:48AM

8 A. I never met with them. I've sat in on a  
9 meeting, but I've never met with them.

10:48AM

10:48AM

10 Q. So just to make sure I understand, so you've  
11 attended meetings, but you're saying that you've not  
12 presented at the meetings?

10:48AM

10:48AM

10:48AM

13 A. Are you saying -- let me clarify. Let me get  
14 clarification. When you say "met with RESAs" --

10:48AM

10:48AM

15 Q. Mm-hmm.

10:48AM

16 A. -- do you mean, like, us monthly RESA meeting  
17 or something like that? No, I've never done that.

10:49AM

10:49AM

18 Q. But you have --

10:49AM

19 A. As my role -- as a district liaison, we met at  
20 a RESA with the DLs. That's as far as it goes for me.

10:49AM

10:49AM

21 Q. So never as a GNETS program specialist?

10:49AM

22 A. No.

10:49AM

23 Q. Have you had any conversations or e-mail  
24 communications with RESAs as a -- within your role as a  
25 GNETS program specialist?

10:49AM

10:49AM

10:49AM

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1	A. No.	10:49AM
2	Q. Do you work with anyone at DCH in connection	10:49AM
3	with GNETS?	10:49AM
4	A. No.	10:49AM
5	Q. Okay. And then do you work with anyone at	10:49AM
6	DBHDD?	10:49AM
7	A. Worked with, no. Attend IDT, yes.	10:49AM
8	Q. Attended IDT.	10:49AM
9	MS. TUCKER: Let's take a break.	10:49AM
10	THE WITNESS: Great.	10:49AM
11	THE VIDEOGRAPHER: Okay. Stand by. Off	10:49AM
12	the record at 10:51 a.m.	10:49AM
13	(Off the record at 10:51 a.m.)	10:49AM
14	THE VIDEOGRAPHER: Back on the record at	11:14AM
15	11:15 a.m.	11:14AM
16	Q. BY MS. JOHNSON: Thank you, Dr. Stevenson.	11:14AM
17	Before we begin, I just want to -- because I know it was	11:14AM
18	our first break -- to go back over some of the ground	11:14AM
19	rules from the beginning, they still stay the same every	11:14AM
20	time we take a break.	11:14AM
21	A. Okay.	11:14AM
22	Q. So we'll do our best to not talk over one	11:14AM
23	another. The head nodding, we'll do our best not to do	11:14AM
24	that. Speak clearly and loudly. Just a reminder that	11:14AM
25	you're under oath as if you're testifying in a court of	11:14AM

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1 law. If you need to take a break, let me know.

11:14AM

2 A. Okay.

11:14AM

3 Q. Any questions?

11:14AM

4 A. No.

11:15AM

5 Q. Okay. Great. So, Dr. Stevenson, please  
6 describe the GNETS program.

11:15AM

11:15AM

7 A. The GNETS program is on the continuing services  
8 for students with special needs and it provides  
9 therapeutic support to students who exhibit  
10 characteristics of emotionally, behavior disorders, with  
11 specific duration frequency and -- yeah.

11:15AM

11:15AM

11:15AM

11:15AM

11:15AM

12 Q. So what would you say the purpose of the  
13 program is?

11:15AM

11:15AM

14 MS. JOHNSON: Objection.

11:15AM

15 THE WITNESS: The purpose of the program is  
16 to provide services to students on a continuing basis.

11:15AM

11:16AM

17 Q. BY MS. JOHNSON: Okay. And then a moment ago,  
18 I believe you said for students who need support,  
19 emotional and behavioral support --

11:16AM

11:16AM

11:16AM

20 A. Who exhibit characteristics --

11:16AM

21 Q. -- who exhibit characteristics of --

11:16AM

22 A. Yes.

11:16AM

23 Q. Would that be the student population that GNETS  
24 is aimed to work with?

11:16AM

11:16AM

25 MS. JOHNSON: Objection.

11:16AM

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1 THE WITNESS: I would say those decisions 11:16AM  
2 are made within an IEP meeting. 11:16AM  
3 Q. BY MS. JOHNSON: How would you describe the 11:16AM  
4 target population of the GNETS program as the GNETS 11:16AM  
5 program specialist? 11:16AM  
6 A. I would say students with severe or 11:16AM  
7 characteristics of severe emotional and behavioral 11:17AM  
8 concerns. 11:17AM  
9 Q. Students with severe emotional or behavioral 11:17AM  
10 concerns? 11:17AM  
11 A. Or who exhibit characteristics of emotional 11:17AM  
12 behavior -- severe emotional behavior. 11:17AM  
13 Q. Okay. And then how does GNETS serve these 11:17AM  
14 students? 11:17AM  
15 A. Could you elaborate? 11:17AM  
16 Q. Well, as GNETS program specialist -- 11:17AM  
17 A. When you say "serve". 11:17AM  
18 Q. -- so how do you work with these students, 11:17AM  
19 like, what does GNETS do for these students? 11:18AM  
20 A. They provide educational therapeutic support. 11:18AM  
21 Q. Do all students receive therapeutic support 11:18AM  
22 through GNETS? 11:18AM  
23 MS. JOHNSON: Objection. 11:18AM  
24 THE WITNESS: I wouldn't be able to answer 11:18AM  
25 that. 11:18AM



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1 Q. BY MS. JOHNSON: Why?

11:18AM

2 A. Because I'm not in every program to know what  
3 every program is doing on a daily basis.

11:18AM

11:18AM

4 Q. But the GNETS program does aim to provide  
5 therapeutic support to its students?

11:18AM

11:18AM

6 A. I would say in the same way schools aim to  
7 provide education to children. Can you guarantee it's  
8 happening everyday?

11:18AM

11:18AM

11:19AM

9 Q. How would you describe the structure of the  
10 GNETS program?

11:19AM

11:19AM

11 MS. JOHNSON: Objection.

11:19AM

12 THE WITNESS: Structure as far as what?

11:19AM

13 Q. BY MS. JOHNSON: So you and Vickie are in the  
14 GaDOE office, correct?

11:19AM

11:19AM

15 A. The SEA, yes.

11:19AM

16 Q. The SEA. And then I think we decided earlier  
17 there's 24 regional GNETS program?

11:19AM

11:19AM

18 A. Correct.

11:19AM

19 Q. Has this changed during your time with GaDOE as  
20 GNETS program specialist?

11:19AM

11:19AM

21 A. There's always been 24.

11:19AM

22 Q. Approximately how many students are in GNETS  
23 this school year, and I mean, 2022/23 school year?

11:19AM

11:19AM

24 A. I don't know.

11:19AM

25 Q. Is this not information you would get as a

11:19AM

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1 GNETS program specialist?

11:19AM

2 A. No.

11:19AM

3 Q. Ever or --

11:19AM

4 A. Unless Vickie gives me that information, then I  
5 wouldn't know.

11:19AM

11:19AM

6 Q. Have you gotten that information in the past?

11:19AM

7 A. I'm not sure. Like, I don't remember if she  
8 might have said, there's so many students in here at  
9 this time. I don't know.

11:19AM

11:20AM

11:20AM

10 Q. Okay. Could you give a ballpark given that  
11 you're one of the two folks in GaDOE who works on this  
12 about how many students are in GNETS?

11:20AM

11:20AM

11:20AM

13 A. (Nodding no.)

11:20AM

14 MS. JOHNSON: Objection.

10:46AM

15 Q. BY MS. TUCKER: If you wanted to receive this  
16 information, who would you contact?

11:20AM

11:20AM

17 A. I would ask Vickie.

11:20AM

18 Q. So do you know if the GNETS population has  
19 remained the same during your time as GNETS program  
20 specialist?

11:20AM

11:20AM

11:20AM

21 A. I know that it's decreased.

11:20AM

22 Q. You know that it's decreased?

11:20AM

23 A. Mm-hmm.

11:21AM

24 Q. Why do you think that is?

11:21AM

25 A. Why has the --

11:21AM

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1	Q. Population decreased?	11:21AM
2	MS. JOHNSON: Objection.	11:21AM
3	THE WITNESS: I'm not sure.	11:21AM
4	Q. BY MS. JOHNSON: You're not sure?	11:21AM
5	A. Mm-hmm.	11:21AM
6	Q. Where do you think SPED students formally being	11:21AM
7	served by GNETS are now receiving services?	11:21AM
8	MS. JOHNSON: Objection.	11:21AM
9	THE WITNESS: Can you repeat that?	11:21AM
10	Q. BY MS. JOHNSON: Yes. So a moment ago you said	11:21AM
11	you understand that the GNETS population has decreased	11:21AM
12	during your time as GNETS program specialist?	11:21AM
13	A. (Nodding yes.)	11:21AM
14	Q. I'm curious where you think the students that	11:21AM
15	formally were in GNETS are now receiving services?	11:21AM
16	MS. JOHNSON: Objection.	11:21AM
17	THE WITNESS: I wouldn't have any way of	11:21AM
18	knowing that.	11:21AM
19	Q. BY MS. TUCKER: Do you expect that those	11:21AM
20	students are receiving special education services still?	11:21AM
21	MS. JOHNSON: Objection.	11:21AM
22	THE WITNESS: I wouldn't have any way of	11:21AM
23	knowing that.	11:21AM
24	Q. BY MS. JOHNSON: Do general education schools	11:21AM
25	support students with emotional and behaviorial	11:21AM

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1 challenges?

11:22AM

2 MS. JOHNSON: Objection.

11:22AM

3 THE WITNESS: I can't speak for all  
4 schools, but I would think. I guess.

11:22AM

5 Q. BY MS. JOHNSON: So would you agree that there  
6 are students with an EBD designation that are not served  
7 in GNETS?

11:22AM

11:22AM

11:22AM

8 A. Yes.

11:22AM

9 Q. Okay. And are they at their home schools?

11:22AM

10 MS. JOHNSON: Objection.

11:22AM

11 THE WITNESS: Not necessarily.

11:22AM

12 Q. BY MS. JOHNSON: Where else would there be?

11:22AM

13 A. There are regional programs.

11:22AM

14 Q. What do you mean by regional programs?

11:22AM

15 A. Programs that serve a specific set of students.

11:22AM

16 It could be EBD, it could be autism, it could be MID.

11:22AM

17 Q. And they're within the school districts?

11:22AM

18 A. Yes.

11:22AM

19 Q. Can you give me an example of one of these  
20 regional programs just to make sure I understand?

11:22AM

11:22AM

21 A. I mean, it's just a class. It's not a program.

11:22AM

22 Q. Okay.

11:22AM

23 A. It's a class within a school district.

11:22AM

24 Q. Within a home school district?

11:23AM

25 A. Well, within a school district. It might not

11:23AM

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1 be that student's home school district but it's within a 11:23AM  
2 school district. 11:23AM

3 Q. Okay. Has GaDOE provided guidance to the 11:23AM  
4 regional GNETS programs about their population size? 11:23AM

5 MS. JOHNSON: Objection. 11:23AM

6 THE WITNESS: When you say "guidance," what 11:23AM  
7 do you mean? 11:23AM

8 Q. BY MS. TUCKER: Have you provided any 11:23AM  
9 information to regional GNETS programs about their 11:23AM  
10 student population in consideration of their student 11:23AM  
11 population? 11:23AM

12 A. Considered -- okay. I understand what you mean 11:23AM  
13 by population, what do you mean by consideration? 11:23AM

14 Q. With who is being referred into GNETS? 11:23AM

15 A. I've never done that. No. 11:23AM

16 Q. Has Vickie? 11:23AM

17 MS. JOHNSON: Objection. 11:23AM

18 THE WITNESS: There have -- I think maybe 11:23AM  
19 at one meeting there was a discussion about GNETS 11:23AM  
20 directors looking at how many students they have. 11:23AM

21 Q. BY MS. TUCKER: Okay. And what was messaged to 11:24AM  
22 the GNETS directors during that meeting? 11:24AM

23 A. Just look at your student population. 11:24AM

24 Q. But for what? 11:24AM

25 A. For -- just to be aware. 11:24AM

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1 Q. To be aware?

11:24AM

2 A. (Nodding yes.)

11:24AM

3 Q. So am I correct that GNETS students are served  
4 in centers and school-based locations?

11:24AM

5 A. Yes.

11:24AM

6 Q. Do you know how many centers are being used  
7 this school year?

11:24AM

11:24AM

8 A. I do not.

11:24AM

9 Q. Do you know how many centers were used last  
10 school year?

11:24AM

11:24AM

11 A. I do not.

11:24AM

12 Q. Is this information that you would typically  
13 have?

11:24AM

11:24AM

14 MS. JOHNSON: Objection.

11:24AM

15 THE WITNESS: Have like what?

11:24AM

16 Q. BY MS. TUCKER: Is this information that you  
17 would typically know about the GNETS program, how many  
18 centers there are --

11:24AM

11:24AM

11:24AM

19 MS. JOHNSON: Objection.

11:24AM

20 Q. BY MS. TUCKER: -- as GNETS program specialist?

11:24AM

21 A. That information is reported -- self-reported  
22 by the GNETS directors in the grant application.

11:24AM

11:25AM

23 Q. Do you then take a look and --

11:25AM

24 A. I mean, if they put it in there as a part of my  
25 review for the GrantApp, then I would look at it, but I

11:25AM

11:25AM

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1 couldn't tell you how many, you know.

11:25AM

2 Q. Do you and Vickie have a list even when you're  
3 planning on where to visit that we need to hit up this  
4 site, this center?

11:25AM

11:25AM

11:25AM

5 A. We call them and ask them for the address.

11:25AM

6 Q. Okay. Do you know how many school-based  
7 locations there are?

11:25AM

11:25AM

8 A. Only if I look in the GrantApp and look at it.

11:25AM

9 Q. And it's in the GrantApp and the strategic plan  
10 or --

11:25AM

11:25AM

11 A. It's not in the strategic plan. It's only in  
12 the GrantApp; and that is self-reported information from  
13 the directors.

11:25AM

11:25AM

11:25AM

14 Q. Got it. Do you confirm this information?

11:25AM

15 MS. JOHNSON: Objection.

11:25AM

16 THE WITNESS: If it's reported by the  
17 directors, then I'm not sure who I would confirm it with  
18 because it's coming from the actual directors of the  
19 program.

11:25AM

11:25AM

11:25AM

11:26AM

20 Q. BY MS. TUCKER: Sure. I mean, when you go to  
21 the visit, do you then confirm that all those sites are  
22 active and operational?

11:26AM

11:26AM

11:26AM

23 A. If we go to those locations, we -- if that's  
24 the location where the review is or if that's the  
25 location where the director asks us to meet, then we'll

11:26AM

11:26AM

11:26AM

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1 go to those.

11:26AM

2 Q. Okay. With the grant applications where you  
3 have this information, do you ever aggregate the data?

11:26AM

4 A. No.

11:26AM

5 Q. Do students in -- GNETS students in centers  
6 have opportunities to interact with their non-disabled  
7 peers?

11:26AM

11:26AM

11:26AM

8 MS. JOHNSON: Objection.

11:26AM

9 THE WITNESS: I wouldn't know for each  
10 center if that's the case.

11:26AM

11:26AM

11 Q. BY MS. TUCKER: Is it your understanding that  
12 there are students without disabilities located --  
13 receiving education at the centers?

11:26AM

11:26AM

11:26AM

14 A. Can you repeat that?

11:26AM

15 Q. Sure. I think earlier we agreed that a GNETS  
16 center was a stand-alone --

11:26AM

11:26AM

17 A. Mm-hmm.

11:26AM

18 Q. -- without -- with only students with  
19 disabilities and not with --

11:26AM

11:27AM

20 A. That's not the case for all of the centers.

11:27AM

21 Q. What are some of the centers like?

11:27AM

22 A. I mean, there might be some centers that are in  
23 a building with students that don't have disabilities.

11:27AM

11:27AM

24 Q. Would that not be a school-based location then?

11:27AM

25 A. No. It's not considered school-based if it's

11:27AM



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1 maybe an alternative school or something.

11:27AM

2 Q. Okay. So some centers are connected to an  
3 alternative school?

11:27AM

11:27AM

4 A. They're in the same building.

11:27AM

5 Q. Okay. Do you know if the students would  
6 have -- would interact with one another, the two?

11:27AM

11:27AM

7 A. I'm not sure.

11:27AM

8 Q. Not sure. Okay. Do students in school-based  
9 locations have opportunities to interact with their  
10 non-disabled peers?

11:27AM

11:27AM

11:27AM

11 MS. JOHNSON: Objection.

11:27AM

12 THE WITNESS: I couldn't speak for all  
13 those either.

11:27AM

11:27AM

14 Q. BY MS. TUCKER: Have you seen some that have  
15 had the opportunity to or non-opportunity?

11:27AM

11:27AM

16 A. I would have to think about it.

11:27AM

17 Q. I'm happy to give you a moment, if you'd like.

11:27AM

18 A. I'm not sure.

11:28AM

19 Q. So when you visit school-based locations and  
20 centers, you've not taken note of interactions with  
21 non-disabled peers?

11:28AM

11:28AM

11:28AM

22 MS. JOHNSON: Objection.

11:28AM

23 THE WITNESS: Well, it depends on the time  
24 of day. If it's during instruction and it's during the  
25 classroom, that's not a time when they might be

11:28AM

11:28AM

11:28AM

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1 interacting, then no, I wouldn't see it because we're 11:28AM  
2 not there all day. 11:28AM

3 Q. BY MS. TUCKER: How long did you usually stay 11:28AM  
4 at a site? 11:28AM

5 A. It just depends on -- it just depends. The 11:28AM  
6 director kind of sets the tone for that. 11:28AM

7 Q. Do you ever visit when students aren't on site? 11:28AM

8 A. Not unless school it's out for the -- like, if 11:28AM  
9 we're there and it's the end of the day and then the 11:28AM  
10 students leave. 11:28AM

11 Q. Does GaDOE provide guidance to the regional 11:28AM  
12 GNETS programs about opportunities for GNET students to 11:29AM  
13 interact with their non-disabled peers? 11:29AM

14 MS. JOHNSON: Objection. 11:29AM

15 THE WITNESS: What do you mean by guidance? 11:29AM

16 Q. BY MS. TUCKER: Do you provide any information 11:29AM  
17 or provide any technical assistance or if you presented 11:29AM  
18 on this issue? 11:29AM

19 A. I can't recall. 11:29AM

20 Q. Okay. As GNETS program's specialist -- 11:29AM

21 A. I can't recall it. 11:29AM

22 Q. -- do you track how many students in 11:29AM  
23 school-based locations are in GNETS for six daily 11:29AM  
24 segments? 11:29AM

25 A. No. 11:29AM

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1 Q. Okay. Let me get another exhibit. 11:29AM

2 MS. TUCKER: I'd like -- actually, this is 11:29AM  
3 what was previously marked as Plaintiff's Exhibit 380, 11:29AM  
4 so we don't -- it's not 422 -- it was already introduced 11:30AM  
5 into this litigation. So you don't need to put a 11:30AM  
6 sticker. 11:30AM

7 (Previously marked Exhibit 380 introduced 11:30AM  
8 into the record.) 11:30AM

9 Q. BY MS. TUCKER: Okay. So this was previously 11:30AM  
10 marked as Plaintiff's Exhibit 380. This is a May 20th, 11:30AM  
11 2020 e-mail thread -- 11:30AM

12 A. Mm-hmm. 11:30AM

13 Q. -- between you and Vickie Cleveland. 11:30AM

14 A. Mm-hmm. 11:30AM

15 Q. There's no subject -- 11:30AM

16 A. Mm-hmm. 11:30AM

17 Q. -- but there's one attachment titled: "GNETS 11:30AM  
18 one pager for SBOE therapeutic supports." 11:30AM

19 A. Mm-hmm. 11:30AM

20 Q. Dr. Stevenson, do you recognize this e-mail 11:30AM  
21 thread? 11:30AM

22 A. Mm-hmm. Yes. I'm sorry. I have a peppermint. 11:30AM

23 Q. No worries. Did you say yes? 11:30AM

24 A. Yes. 11:30AM

25 Q. Okay. So we'll take -- we'll go to the first 11:30AM

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1 e-mail, which is the bottom e-mail in the chain, and 11:30AM  
2 it's from you. Do you see that -- 11:30AM

3 A. (Witness examining documents.) 11:30AM

4 Q. -- with the May 20th, 2019 at 11:18 a.m.? 11:30AM

5 A. Yes. 11:31AM

6 Q. Okay. Do you see where you write, "take a look 11:31AM  
7 and let me know if this works," to Vickie Cleveland? 11:31AM

8 A. Yes. 11:31AM

9 Q. Okay. And I'm assuming it was the -- is it the 11:31AM  
10 attachment? 11:31AM

11 A. Yes. 11:31AM

12 Q. Okay. Did -- did Vickie ask you to develop 11:31AM  
13 this attachment? 11:31AM

14 A. Yes. 11:31AM

15 Q. Why? 11:31AM

16 A. This was the summary I mentioned previously of 11:31AM  
17 the therapeutic supports grant. 11:31AM

18 Q. Okay. 11:31AM

19 A. And we talked -- and when I mentioned that, the 11:31AM  
20 summary is done near the end of the year for the logs. 11:31AM

21 This is the beginning -- the summary. 11:31AM

22 Q. Okay. So this is for the 2018-2019 school 11:31AM  
23 year? 11:31AM

24 A. Based on what it says, yes. 11:31AM

25 Q. Okay. Let's look at the top box. It reads 11:31AM

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1 that, "GNETS programs provide comprehensive,  
2 educational, and therapeutic support services to  
3 students who might otherwise require residential or more  
4 other -- or other more restrictive placements due to the  
5 severity of one or more of the characteristics of the  
6 disability category of emotional and behavioral  
7 disorders, EBD."

8 A. Mm-hmm.

9 Q. Do you see that?

10 A. (Nodding yes.)

11 Q. Are you aware of any study that has assessed  
12 the impact of GNETS services on the need for residential  
13 or more restrictive placements for students in Georgia?

14 A. No.

15 Q. Does GaDOE collect any data that assesses the  
16 impact of GNETS services on the need for residential or  
17 more restrictive placements for students in Georgia?

18 A. Not to my knowledge.

19 MS. JOHNSON: Objection.

20 THE WITNESS: Not to my knowledge.

21 Q. BY MS. TUCKER: Do you know if any State agency  
22 does?

23 A. I'm not sure.

24 Q. Now I'd like to introduce what is Plaintiff's  
25 Exhibit 422 -- no, yes. 422.

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1 (Plaintiff's Exhibit 422 marked for  
2 identification.)

3 Q. BY MS. TUCKER: The Bates number on the first  
4 page of this exhibit reads GA00946193. This is an  
5 e-mail thread with the most recent e-mail dated  
6 April 23rd, 2019, and it's an e-mail from you to Vickie  
7 Cleveland. The subject reads: "Please forward to  
8 Vickie Cleveland."

9 A. (Witness examining document.)

10 Q. Dr. Stevenson, do you recognize this e-mail  
11 thread?

12 A. Yes.

13 Q. Okay. The first e-mail on the chain is to you  
14 from a Jackie Neal?

15 A. Mm-hmm.

16 Q. Who is Jackie Neal?

17 A. Yes. I'm sorry.

18 Q. You're good. We'll get it.

19 A. She's a director for NorthStar GNETS.

20 Q. And that's one of the 24 regional GNETS  
21 programs?

22 A. Yes.

23 Q. Do you see where Jackie Neal writes, "Pickens  
24 County has decided they would like to withdraw from  
25 GNETS services and they have decided they would prefer

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1 to move services in system"?

11:34AM

2 A. Yes.

11:34AM

3 Q. Okay. Am I correct that Jackie Neal is saying  
4 Pickens County no longer wants to participate in GNETS?  
5 Is that what this e-mail says?

11:34AM

11:34AM

11:34AM

6 A. That's what the e-mail says.

11:34AM

7 Q. Okay. Did you have any conversations with  
8 Jackie Neal?

11:34AM

11:34AM

9 A. I did not. I forwarded it to Vickie.

11:34AM

10 Q. Do you understand why Pickens County no longer  
11 wanted to participate?

11:34AM

11:34AM

12 A. I was not part of the conversation.

11:34AM

13 Q. Have other school districts left the GNETS  
14 program since you've been working as GNETS program  
15 specialist?

11:34AM

11:34AM

11:34AM

16 A. I think one.

11:34AM

17 Q. Which one?

11:35AM

18 A. Effingham. They were part of Savannah-Chatham.

11:35AM

19 Q. Did you have conversations with anyone about  
20 why Effingham choose to leave?

11:35AM

11:35AM

21 A. I did not.

11:35AM

22 Q. What steps does GaDOE take after receiving  
23 notification that a school district wants to end their  
24 participation?

11:35AM

11:35AM

11:35AM

25 A. That's really not within my scope of what I

11:35AM

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1	know or do.	11:35AM
2	Q. Okay.	11:35AM
3	A. I just change the map once they're not there.	11:35AM
4	Q. When Jackie Neal wrote that Pickens County	11:35AM
5	wants to, "Move services in system." What did you	11:35AM
6	understand that to mean?	11:35AM
7	MS. JOHNSON: Objection.	11:35AM
8	THE WITNESS: I sent this to Vickie. I	11:35AM
9	don't -- I didn't get involved in this.	11:35AM
10	Q. BY MS. TUCKER: Do you think it would be fair	11:35AM
11	to have an understanding that they're moving services	11:36AM
12	within the school district?	11:36AM
13	A. I'm not sure.	11:36AM
14	Q. Does the departure of a school district have a	11:36AM
15	negative impact on GNETS funding?	11:36AM
16	MS. JOHNSON: Objection.	11:36AM
17	THE WITNESS: I'm not familiar with that.	11:36AM
18	Q. BY MS. TUCKER: How about the regional GNETS	11:36AM
19	program funding through the GNETS app?	11:36AM
20	MS. JOHNSON: Objection.	11:36AM
21	THE WITNESS: I'm not sure.	11:36AM
22	Q. BY MS. TUCKER: You don't work on how much	11:36AM
23	money the GNETS programs receives?	11:36AM
24	A. I do not.	11:36AM
25	Q. Okay. Thank you. Okay. Earlier we spoke a	11:36AM



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1 little bit about the GNETS rule.

11:36AM

2 A. Mm-hmm.

11:36AM

3 Q. What is the purpose of the GNETS rule?

11:36AM

4 MS. JOHNSON: Objection.

11:36AM

5 THE WITNESS: The purpose is what it states  
6 in the rule.

11:37AM

11:37AM

7 Q. BY MS. TUCKER: Does it guide your work?

11:37AM

8 A. In what way?

11:37AM

9 Q. Do you refer to it in your work on what your  
10 responsibilities are?

11:37AM

11:37AM

11 A. I wouldn't say I refer to it that directly, no.

11:37AM

12 Q. Okay.

11:37AM

13 A. In my work, no.

11:37AM

14 Q. Do you know when the most -- this, the most  
15 recent GNETS rule, was enacted?

11:37AM

11:37AM

16 A. I don't.

11:37AM

17 Q. Do you look to the rule often?

11:37AM

18 A. If it's needed for a presentation or, you know,  
19 a situation.

11:38AM

11:38AM

20 Q. Do you present on the GNETS rule?

11:38AM

21 A. I -- if it's a part of the overview, the broad  
22 overview, then we will read the rule to whoever is there  
23 at the presentation.

11:38AM

11:38AM

11:38AM

24 Q. So you read the rule --

11:38AM

25 A. Mm-hmm.

11:38AM

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1 Q. -- to whoever is there?

11:38AM

2 A. (Nodding Mm-hmm.)

11:38AM

3 Q. Do you provide any other thoughts on what the  
4 rule says to the audience that's there?

11:38AM

5 A. I don't.

11:38AM

6 Q. You don't. Just Vickie?

11:38AM

7 MS. JOHNSON: Objection.

11:38AM

8 THE WITNESS: In what way?

11:38AM

9 Q. BY MS. TUCKER: Well, I guess I'm wondering,  
10 you know, you're reading the rule --

11:38AM

11 A. Mm-hmm.

11:38AM

12 Q. -- and it's, you know, it has some formal  
13 language. Do you then explain informally what some of  
14 the requirements are?

11:38AM

15 A. Can you give me an example?

11:38AM

16 Q. Sure. Let's go ahead and look at the rule.

11:38AM

17 A. Okay.

11:39AM

18 Q. So I'm going to give you what was already  
19 introduced as Plaintiff's Exhibit 82.

11:39AM

20 A. Okay.

11:39AM

21 Q. So I can give it directly to you.

11:39AM

22 A. Okay.

11:39AM

23 (Previously marked Plaintiff's Exhibit 82  
24 introduced into evidence.)

11:39AM

25 Q. BY MS. TUCKER: There you go. Do you recognize

11:39AM

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1 this document as the GNETS rule?

11:39AM

2 A. Yes.

11:39AM

3 Q. Okay. So let's go to Section 5(a), which  
4 begins on Page 4.

11:39AM

11:39AM

5 A. Okay.

11:39AM

6 Q. Okay. And this is on the SEAs duties and  
7 responsibilities, correct?

11:39AM

11:39AM

8 A. Correct.

11:39AM

9 Q. Okay. And earlier we agreed that the SEA is  
10 the State Education Agency?

11:39AM

11:39AM

11 A. Yes.

11:39AM

12 Q. Okay. And would that be the State Board of  
13 Education here or GaDOE?

11:39AM

11:39AM

14 A. Yes.

11:39AM

15 Q. Okay. State Board or GaDOE, you just said yes?

11:39AM

16 A. I'm sorry.

11:39AM

17 Q. What does SEA refer to in the rule?

11:39AM

18 A. State Education Agency.

11:39AM

19 Q. So looking at the first page, going back to  
20 Page 1.

11:39AM

11:40AM

21 A. Page 1?

11:40AM

22 Q. Yes, we'll go back. So the State Education  
23 Agency in the rule, if you look at (g), it refers to the  
24 Georgia State Board, the Georgia Board of Education, the  
25 SBOE, correct?

11:40AM

11:40AM

11:40AM

11:40AM

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1 A. Yes.

11:40AM

2 Q. Okay. Let's go back to the duties and  
3 responsibilities.

11:40AM

11:40AM

4 A. (Witness complying.)

11:40AM

5 Q. So during those general overviews, do you talk  
6 about the SEA's role in that presentation?

11:40AM

11:40AM

7 A. We read the SEA's role.

11:40AM

8 Q. Okay. So you read it just as is. Do you  
9 provide any sort of informal clarification or do you  
10 simply read it?

11:40AM

11:40AM

11 A. I just read it.

11:40AM

12 Q. What about does anyone else explain it to the  
13 folks that are listening to the presentation?

11:40AM

11:41AM

14 MS. JOHNSON: Objection.

11:41AM

15 THE WITNESS: If someone asks a question, I  
16 guess Vickie might respond.

11:41AM

11:41AM

17 Q. BY MS. TUCKER: Did you ever answer questions?

11:41AM

18 A. No.

11:41AM

19 Q. You don't answer --

11:41AM

20 A. I just do the PowerPoint and read what I'm  
21 supposed to read, as far as that's concerned.

11:41AM

11:41AM

22 Q. As far as what's concerned?

11:41AM

23 A. The board rule.

11:41AM

24 Q. The board rule. Have you -- okay. Well, let's  
25 look at the first one: "The SEA shall receive and

11:41AM

11:41AM

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1 disburse funds appropriated by the General -- Georgia  
2 General Assembly to support GNETS services."

3 A. Yes.

4 Q. Who works on this within GaDOE?

5 MS. JOHNSON: Objection.

6 THE WITNESS: Whoever does the budget for  
7 GaDOE.

8 Q. BY MS. TUCKER: Let's look at the second one:  
9 "The SEA shall administer the grant funds by performing  
10 the following in collaboration with GaDOE." The first  
11 is: "Developing rules and procedures, regulating the  
12 operation of the GNETS grant, including the application  
13 process."

14 A. Mm-hmm. Yes.

15 Q. Yes. What role do you play with this?

16 MS. JOHNSON: Objection.

17 THE WITNESS: The application process is  
18 the grant application, so I look at that information.

19 Q. BY MS. TUCKER: This says: "Develop rules and  
20 procedures." What other rules are there?

21 A. I don't develop any rules for the GrantApp.

22 Q. Do you develop any procedures?

23 A. Procedures as far as, you know, showing them  
24 where to upload anything they might need to upload.  
25 That's about it.

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1 Q. The next one: "Notifying the fiscal agents  
2 regarding each fiscal year's allocation and approve  
3 GNETS services budgets."

11:42AM

11:43AM

11:43AM

4 A. I don't do that.

11:43AM

5 Q. Do you know who does?

11:43AM

6 A. I'm not sure. I'm not sure who approves it.

11:43AM

7 Q. Uh-huh.

11:43AM

8 A. But once it's received, I know that the special  
9 Ed director sends it out, but I don't know who it comes  
10 from and how all that works.

11:43AM

11:43AM

11:43AM

11 Q. So when the GNETS grant -- or the GNETS budget  
12 is received, the special education director then sends  
13 it out, is that what you meant?

11:43AM

11:43AM

11:43AM

14 A. I'm not sure.

11:43AM

15 Q. I was just repeating what you said.

11:43AM

16 A. Yeah, that's what I said, but I'm not for sure.  
17 That's what I think.

11:43AM

11:43AM

18 Q. Okay. The next is: "Monitor GNETS to ensure  
19 compliance with federal and state policies, procedures,  
20 rules, and the delivery of appropriate instructional and  
21 therapeutic services."

11:43AM

11:43AM

11:43AM

11:43AM

22 A. Yes.

11:43AM

23 Q. How does GaDOE monitor GNETS to ensure  
24 compliance with federal policies, procedures, and rules?

11:43AM

11:44AM

25 A. That is done --

11:44AM

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1 MS. JOHNSON: Objection. 11:44AM

2 THE WITNESS: I assume that would be done 11:44AM

3 through Cross Functional Monitoring, general 11:44AM

4 supervision. 11:44AM

5 Q. BY MS. TUCKER: What federal policies is this 11:44AM

6 referring to? 11:44AM

7 A. I don't know. 11:44AM

8 MS. JOHNSON: Objection. 11:44AM

9 Q. BY MS. TUCKER: What about federal rules? 11:44AM

10 A. I don't know. 11:44AM

11 Q. And federal procedures? 11:44AM

12 A. I don't know. 11:44AM

13 MS. JOHNSON: Objection. 11:44AM

14 Q. BY MS. TUCKER: Does your work as GNET's 11:44AM

15 program specialist touch on any federal rule? 11:44AM

16 A. I don't know. 11:44AM

17 Q. How does GaDOE monitor GNETS to ensure 11:44AM

18 compliance with the state policies, procedures and 11:44AM

19 rules? 11:44AM

20 A. I would -- 11:44AM

21 MS. JOHNSON: Objection. 11:44AM

22 THE WITNESS: I would think general 11:44AM

23 supervision. 11:44AM

24 Q. BY MS. TUCKER: And what do you mean by general 11:44AM

25 supervision? 11:44AM

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1 A. General supervision as far as what the State  
2 provides for all students.

3 Q. What State policies and procedures and rules  
4 does the GNETS -- this GNETS rule is referring to?

5 MS. JOHNSON: Objection.

6 THE WITNESS: I don't know.

7 Q. BY MS. TUCKER: But you present on this?

8 A. I read it.

9 Q. You read it. Okay. Are these type of  
10 questions that you would receive from regional GNETS  
11 programs?

12 A. No.

13 Q. How does GaDOE monitor GNETS to ensure: "The  
14 delivery of appropriate and instructional and  
15 therapeutic services"?

16 MS. JOHNSON: Objection.

17 THE WITNESS: I would assume through  
18 general supervision.

19 Q. BY MS. TUCKER: Who makes determinations about  
20 whether instructional and therapeutic services are  
21 appropriate?

22 MS. JOHNSON: Objection.

23 THE WITNESS: (Nodding I don't know.)

24 Q. BY MS. TUCKER: Is that something that you and  
25 Vickie do in your role?



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1 A. Not to -- not to my knowledge. I'm not sure. 11:45AM

2 Q. So as GNETS program specialist you don't -- do 11:45AM  
3 you make determinations about the appropriateness of 11:45AM  
4 instructional services at GNETS? 11:46AM

5 A. I do not. 11:46AM

6 Q. Do you make determinations about the 11:46AM  
7 appropriateness of the therapeutic services in GNETS? 11:46AM

8 A. Appropriateness as far as? It's 11:46AM  
9 individualized. So are we making a general statement of 11:46AM  
10 appropriateness, because it's individualized for every 11:46AM  
11 student? 11:46AM

12 Q. I'm just -- I'm reading the rule. So, yeah, do 11:46AM  
13 you visit and see that a therapeutic service doesn't 11:46AM  
14 appear appropriate, would you make a comment? 11:46AM

15 MS. JOHNSON: Objection. 11:46AM

16 THE WITNESS: I can't say because I've 11:46AM  
17 never observed that. 11:46AM

18 Q. BY MS. TUCKER: Okay. What about when you 11:46AM  
19 received the social worker's logs we talked about 11:46AM  
20 earlier, do you ever give feedback on whether think 11:46AM  
21 that -- 11:47AM

22 A. I do not. 11:47AM

23 Q. Let me -- 11:47AM

24 A. I'm sorry. 11:47AM

25 Q. That's okay. 11:47AM

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1 A. I'm sorry. 11:47AM

2 Q. Let me just finish. Do you ever make 11:47AM  
3 statements about whether you think the therapeutic 11:47AM  
4 interventions are appropriate? 11:47AM

5 A. I do not. 11:47AM

6 Q. Do you know if anyone does? 11:47AM

7 A. I'm not sure. 11:47AM

8 Q. What steps are taken if a regional GNETS 11:47AM  
9 program does not comply with the GNETS rule? 11:47AM

10 MS. JOHNSON: Objection. 11:47AM

11 THE WITNESS: I'm not sure. 11:47AM

12 Q. BY MS. TUCKER: So when you present on this, 11:47AM  
13 you read it, but do you talk about -- 11:47AM

14 A. I do not. 11:47AM

15 Q. -- the requirements? 11:47AM

16 A. (Nodding no.) 11:47AM

17 Q. You -- 11:47AM

18 A. I read it. 11:47AM

19 Q. You read it. Do you also provide written 11:47AM  
20 guidance on the GNETS rule to the regional programs? 11:47AM

21 MS. JOHNSON: Objection. 11:47AM

22 THE WITNESS: In what way? 11:47AM

23 Q. BY MS. TUCKER: Handouts? 11:47AM

24 A. Not that I can recall. 11:47AM

25 Q. Are there any presentations that are focused 11:47AM

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1 solely on the GNETS rules that you've presented on or  
2 have turned the PowerPoint on?

3 A. Not -- not that I can remember solely on the  
4 board rule. Not that I can recall at this time.

5 Q. Dr. Stevenson, what is the ConApp, C-O-N A-P-P?

6 A. Consolidated application. It's within the  
7 portal. I don't work with the consolidated app, that's  
8 more Vickie, because that's dealing with the numbers as  
9 far as the budget that the GNETS directors submit.

10 Q. So that's different than the GNETS grant  
11 application?

12 A. Yes, it is.

13 Q. Okay. How often is the ConApp submitted?

14 A. I'm not sure.

15 Q. Do all GNETS programs have to -- regional GNETS  
16 programs have to fill out the ConApp?

17 A. Yes. The budget liaisons looks at that.

18 Q. And that's annual?

19 A. To my understanding.

20 Q. Does -- did Vickie create the ConApp --

21 A. No.

22 Q. -- or was it the budget folks?

23 A. The budget.

24 Q. Okay. Let's talk a little -- we've talked a  
25 little bit about the grant application.

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1 A. Yes.

11:49AM

2 Q. But I want to talk a little bit more.

11:49AM

3 A. Okay.

11:49AM

4 Q. Who creates the grant application?

11:49AM

5 MS. JOHNSON: Objection.

11:49AM

6 THE WITNESS: Who creates it?

11:49AM

7 Q. BY MS. TUCKER: Yes, who drafts it?

11:49AM

8 A. Oh, that was before I started in this role.

11:49AM

9 Q. If you want to make changes, do you and Vickie  
10 make those changes?

11:49AM

11:49AM

11 A. Yes.

11:49AM

12 Q. Have you -- have there been changes to the  
13 grant -- GNETS grant application since you've started in  
14 2018?

11:49AM

11:50AM

11:50AM

15 A. It was paper and now it's in the portal, and it  
16 was just taken exactly what was on the paper and putting  
17 it in the portal, developing -- the IT people developing  
18 it in the portal.

11:50AM

11:50AM

11:50AM

11:50AM

19 Q. Got it. Were there any substantive or wording  
20 changes or was it paper straight to portal?

11:50AM

11:50AM

21 A. Paper straight to portal. I don't recall us  
22 making any changes to it.

11:50AM

11:50AM

23 Q. What prompted the change to move it to  
24 electronic?

11:50AM

11:50AM

25 A. Who wants to look at all the papers. It's

11:50AM

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1 easier to be electronic. That's the answer.

11:50AM

2 Q. I understand. Okay.

11:50AM

3 MS. TUCKER: Okay. I'd like the Court  
4 Reporter to mark this document as Plaintiff's  
5 Exhibit 423.

11:50AM

11:50AM

11:51AM

6 (Plaintiff's Exhibit 423 marked for  
7 identification.)

11:51AM

11:51AM

8 MS. TUCKER: Actually, can we also go off  
9 the record for one moment?

11:51AM

11:51AM

10 THE VIDEOGRAPHER: Yes. Stand by.

11:51AM

11 MS. TUCKER: Thank you.

11:51AM

12 THE VIDEOGRAPHER: Off the record at  
13 11:52 a.m.

11:51AM

11:51AM

14 (Off the record.)

11:52AM

15 THE VIDEOGRAPHER: We are back on the  
16 record at 11:54 a.m.

11:52AM

11:53AM

17 Q. BY MS. TUCKER: The Court Reporter just handed  
18 you a document that was marked as Plaintiff's  
19 Exhibit 423. The Bates number on the first page of this  
20 exhibit is GA00953689. The most recent date on the  
21 e-mail thread is November 18th, 2019, and it is an  
22 e-mail from you --

11:53AM

11:53AM

11:53AM

11:53AM

11:53AM

11:53AM

23 A. Mm-hmm.

11:53AM

24 Q. -- to the regional GNETS program directors, and  
25 Vickie Cleveland is copied. The subject reads:

11:53AM

11:53AM

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1	"GrantApp PP." And will there is one attachment.	11:53AM
2	A. (Witness examining document.)	11:53AM
3	Q. Dr. Stevenson, do you recognize this e-mail	11:53AM
4	thread?	11:53AM
5	A. Yes.	11:53AM
6	Q. Okay. Am I correct that you presented to the	11:53AM
7	regional GNETS program directors on the GNETS grant	11:53AM
8	application?	11:53AM
9	A. Yes.	11:53AM
10	Q. And then the attachment which begins with	11:53AM
11	GA00953691 and then that says it's produced in native	11:53AM
12	format, which we then presented for PowerPoint. Do you	11:54AM
13	see that?	11:54AM
14	A. Yes.	11:54AM
15	Q. Is this the PowerPoint presentation you used?	11:54AM
16	A. Yes.	11:54AM
17	Q. Okay. Did you create this PowerPoint?	11:54AM
18	A. Yes.	11:54AM
19	Q. Is it still current?	11:54AM
20	A. (Witness examining document.) To the best of	11:54AM
21	my knowledge, without taking a lot of time, yes.	11:55AM
22	Q. Okay. And then given earlier you said that	11:55AM
23	there hasn't been any substantive changes to the	11:55AM
24	application, so this -- correct?	11:55AM
25	A. I'm thinking yes.	11:55AM

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1 Q. How often do you give this training? 11:55AM

2 A. There hasn't been any changes to the way the 11:55AM  
3 information is entered into the portal. So I have not 11:55AM  
4 had to train on how to enter the information into the 11:55AM  
5 portal again because that has not changed. 11:55AM

6 Q. And that's what this -- 11:55AM

7 A. This was once we switch from paper to 11:55AM  
8 electronic. 11:56AM

9 Q. Mm-hmm. 11:56AM

10 A. This is showing the directors what it looks 11:56AM  
11 like. So I went through each individual page and showed 11:56AM  
12 them what it looked like in real time and then created 11:56AM  
13 this as a resource. 11:56AM

14 Q. But it's not an annual training before the 11:56AM  
15 grant application is due? 11:56AM

16 A. No. Unless there's a new director who needs to 11:56AM  
17 know how to put the information in. 11:56AM

18 Q. Would that end up being like a one on one? 11:56AM

19 A. That would be a one on one. 11:56AM

20 Q. And you have presented to the GNETS program 11:56AM  
21 directors on this? 11:56AM

22 A. Yes. 11:56AM

23 Q. Okay. Can you walk me through the timeline of 11:56AM  
24 submitting the GNETS grant application, like, when does 11:56AM  
25 the application open? 11:56AM

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1 A. So that information has changed, but how the  
2 information is entered has not.

3 Q. Okay. So when is it opened now?

4 A. Now, in January.

5 Q. Okay. When did it used to be open?

6 A. I would have to think about that.

7 Q. Okay.

8 A. I know now it's January, though.

9 Q. When did it change to January?

10 A. Maybe in the last two years.

11 Q. The last two years. Okay. So it opens in  
12 January, and if I was original GNETS program I would  
13 apply in January for the school year that begins in  
14 August; is that correct?

15 A. Yes. I think. It's for the fiscal year. So  
16 if we're in FY '22, it would be for FY '23. So if we're  
17 in FY '23, it would be for FY '24. So the up -- the  
18 next fiscal year.

19 Q. Okay.

20 A. So in FY -- fiscal year '22, they apply for  
21 fiscal year '23. Now we're in fiscal year '23, and they  
22 would apply for fiscal year '24.

23 Q. When does the fiscal year start and end for  
24 you-all?

25 A. I believe it's in June -- June or July.



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1 Q. June or July. Okay. So if applied in 11:58AM  
2 January -- if I was a regional GNETS director and I 11:58AM  
3 applied for the grants in January of 2022, it was for 11:58AM  
4 fiscal year '23? 11:58AM

5 A. It's not due until May. 11:58AM

6 Q. Okay. 11:58AM

7 A. So it's opened in January, but they have until 11:58AM  
8 May to complete it. 11:58AM

9 Q. Okay. And it's submitted through the portal? 11:58AM

10 A. Yes. 11:58AM

11 Q. So once it's submitted in May, when it 11:58AM  
12 closes -- 11:58AM

13 A. Mm-hmm. 11:58AM

14 Q. -- how long is the review process of the 11:58AM  
15 application? 11:58AM

16 A. Well, it just depends because we have to go 11:58AM  
17 through each one and look at the attachment, so it just 11:58AM  
18 depends on how long it takes us to finish all of that. 11:58AM

19 Q. Do you have a deadline to meet to make sure you 11:58AM  
20 get it done in time for the next step? 11:58AM

21 A. We have -- we try to have them done within a 11:59AM  
22 month. 11:59AM

23 Q. Within a month. So May. And then you have 11:59AM  
24 like a month? 11:59AM

25 A. Yeah. 11:59AM



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1 Q. Okay. Who reviews? 11:59AM

2 A. Myself and Vickie. 11:59AM

3 Q. Do you review them all together? 11:59AM

4 A. We'll review them separately. We'll split the 11:59AM  
5 list, 12 and 12, and then Vickie would always, you know, 11:59AM  
6 look at mine also. 11:59AM

7 Q. Do you-all meet to discuss them? 11:59AM

8 A. Yes. 11:59AM

9 Q. Do you discuss her 12 as well? 11:59AM

10 A. Sometimes. 11:59AM

11 Q. What would you discuss within the grant 11:59AM  
12 application with Vickie? 11:59AM

13 A. If someone didn't submit an attachment, or if 11:59AM  
14 someone was having technical issues and they reached out 12:00PM  
15 to me and I needed to reach out to IT, I might -- if I 12:00PM  
16 had a question about something, she might answer it. So 12:00PM  
17 it just depends. 12:00PM

18 Q. Okay. When are the regional GNETS programs 12:00PM  
19 advised that their grant application has been approved? 12:00PM

20 A. So this year we are meeting with them 12:00PM  
21 individually, and that's -- that started this year. So 12:00PM  
22 we meet to discuss their GrantApp, and if any additional 12:00PM  
23 documentation is needed. 12:00PM

24 Q. Okay. Just to make sure I understand, so in 12:00PM  
25 May, once you receive them, you-all discuss, and then 12:00PM

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1 this summer you then met with the regional GNETS

12:00PM

2 programs about their application?

12:00PM

3 A. If there is something else that's needed.

12:00PM

4 Q. So would you meet with all 24 on this or just  
5 if they need something?

12:00PM

12:01PM

6 A. And when we meet it's not necessarily -- well,  
7 yeah. It could be if just something is needed or it  
8 could be just a touch base like, hey, we got your  
9 information and printout.

12:01PM

12:01PM

12:01PM

12:01PM

10 Q. Okay. And you started that in 2022?

12:01PM

11 A. Yes.

12:01PM

12 Q. But when -- so, I'm sorry. Let's go back.

12:01PM

13 When do they receive notice that they have funding?

12:01PM

14 A. So once we -- once we do the sign off, they get  
15 a notification that the GrantApp has been signed off.

12:01PM

12:01PM

16 Q. And does that have to be before the beginning  
17 of the fiscal year?

12:01PM

12:01PM

18 A. Within the best of our abilities.

12:01PM

19 Q. Does that mean it doesn't always happen?

12:02PM

20 A. 99 percent of the time it does.

12:02PM

21 Q. Are you thinking about a program that didn't --

12:02PM

22 A. It's not necessarily they didn't submit it,  
23 they might just need to have some more information and  
24 so you have to keep going back and forth, and then it's  
25 summer and they're out and then they come back, so it

12:02PM

12:02PM

12:02PM

12:02PM

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1 just depends.

12:02PM

2 Q. When do they receive the funding from the  
3 grant?

12:02PM

12:02PM

4 A. That, I don't know.

12:02PM

5 Q. Who would know?

12:02PM

6 A. Vickie.

12:02PM

7 Q. Do the regional GNETS programs answer different  
8 questions on the grant applications, are there any  
9 questions that are tailored?

12:02PM

12:02PM

12:02PM

10 A. No. They're all the same.

12:02PM

11 Q. Okay. So like North Metro has to provide the  
12 exact same information that you and Alexander has to  
13 provide?

12:02PM

12:02PM

12:02PM

14 A. Correct. Now how they provide it, is  
15 different, because it's different for every program  
16 because -- but there are certain things they all have to  
17 provide.

12:02PM

12:02PM

12:02PM

12:02PM

18 Q. In addition to presenting on the portal and how  
19 to access the application and reviewing the applications  
20 with Vickie, what other roles do you have related to the  
21 GNETS grant application?

12:03PM

12:03PM

12:03PM

12:03PM

22 A. That's it.

12:03PM

23 Q. Do you review them prior to submission in the  
24 portal?

12:03PM

12:03PM

25 A. Well, as they're entering them, we can see it,

12:03PM

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1	so...	12:03PM
2	Q. Oh, okay.	12:03PM
3	A. Yeah.	12:03PM
4	Q. Like in real time?	12:03PM
5	A. Mm-hmm.	12:03PM
6	Q. Do you ever make comments before they hit	12:03PM
7	submit?	12:03PM
8	A. If they call and ask a question and they ask me	12:03PM
9	to look at it.	12:03PM
10	Q. So you provide the technical assistance?	12:03PM
11	A. If needed.	12:04PM
12	MS. TUCKER: I'd like the Court Reporter to	12:04PM
13	mark this document as Plaintiff's Exhibit 424.	12:04PM
14	(Plaintiff's Exhibit 424 marked for	12:04PM
15	identification.)	12:04PM
16	THE VIDEOGRAPHER: Let's go off the record	12:04PM
17	briefly for your microphone. Do you see it?	12:04PM
18	MS. TUCKER: It's right there.	12:05PM
19	THE VIDEOGRAPHER: Oh, is it inside your	12:05PM
20	jacket?	12:05PM
21	MS. TUCKER: Thank you. It slipped.	12:05PM
22	(Off the record conversation.)	12:05PM
23	MS. TUCKER: Are we back on the record?	12:05PM
24	THE VIDEOGRAPHER: We never went off.	12:05PM
25	THE COURT REPORTER: We never went off.	12:05PM

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1	MS. TUCKER: Okay.	12:05PM
2	THE VIDEOGRAPHER: I'm so sorry.	12:05PM
3	MS. TUCKER: It's okay. Yeah, no problem.	12:05PM
4	Okay. We're on the record.	12:05PM
5	Q. BY MS. TUCKER: I handed the Court Reporter	12:05PM
6	what was to be marked as Plaintiff's Exhibit 424. Do	12:05PM
7	you have it?	12:05PM
8	A. Yes.	12:05PM
9	Q. Great. The Bates number on the first page of	12:05PM
10	this exhibit is GA00963291. The most recent date on	12:05PM
11	this e-mail thread is November 18th, 2020, and it's an	12:05PM
12	e-mail from you to Vickie Cleveland. The subject reads:	12:05PM
13	"SM grant application."	12:05PM
14	A. (Witness examining document.)	12:05PM
15	Q. Dr. Stevenson, do you recognize this e-mail	12:05PM
16	thread?	12:05PM
17	A. Yes.	12:05PM
18	Q. Am I correct that SM grant application refers	12:05PM
19	to the South Metro GNETS grant application?	12:05PM
20	A. Yes.	12:05PM
21	Q. In the earlier e-mail, do you see where Vickie	12:05PM
22	Cleveland asked you to follow up with Derrick about	12:05PM
23	revisions to a grant application?	12:05PM
24	A. Yes.	12:05PM
25	Q. Does she mean Derrick Gilchrist?	12:05PM

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1	A. Yes.	12:06PM
2	Q. And what is Derrick Gilchrist's role?	12:06PM
3	A. Director of South Metro GNETS.	12:06PM
4	Q. Okay. And does she mean following up with him	12:06PM
5	on his GNETS grant application?	12:06PM
6	A. Yes.	12:06PM
7	Q. Okay. And in that later e-mail, the top one	12:06PM
8	you say that you did, correct?	12:06PM
9	A. Yes.	12:06PM
10	Q. Do you recall that conversation with	12:06PM
11	Mr. Gilchrist?	12:06PM
12	A. I do not.	12:06PM
13	Q. What type of feedback would you have given	12:06PM
14	Mr. Gilchrist on what Vickie identified below?	12:06PM
15	A. I would have just asked him to upload the	12:06PM
16	information that she requested.	12:06PM
17	Q. Okay. And have you given other sort of	12:06PM
18	feedback to other regional GNETS directors?	12:06PM
19	A. I mean, feedback as far as you need to upload	12:06PM
20	additional information.	12:06PM
21	Q. Do you ever ask questions about the substance	12:06PM
22	of the information?	12:07PM
23	A. Not if I'm just asking to upload something, no.	12:07PM
24	Q. Yeah, I mean separately, though. So here	12:07PM
25	Vickie wrote, "Tiered behavior intervention. More info	12:07PM

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1 needed." Do you see that?

12:07PM

2 A. Yes. For example, if he just wrote we provide  
3 tiered behavior interventions and he doesn't show the  
4 tier behavior interventions, that's what that would  
5 mean.

12:07PM

12:07PM

12:07PM

12:07PM

6 Q. Do you assess something -- do you assess any of  
7 the information provided given your role as GNETS  
8 program specialist and having an EdD, does any of that  
9 come in to your review of a GNETS grant application?

12:07PM

12:07PM

12:07PM

12:07PM

10 A. Not if it's -- not if I'm not asked to do that.

12:07PM

11 Q. Are you asked to do that?

12:07PM

12 A. I do what I'm asked.

12:07PM

13 Q. Would you say your, you know, your EdD informs  
14 your work as GNETS program specialist?

12:07PM

12:08PM

15 MS. JOHNSON: Objection.

12:08PM

16 THE WITNESS: What do you mean informs my  
17 work?

12:08PM

12:08PM

18 Q. BY MS. TUCKER: You know, your -- you have a  
19 Doctorate in Education with a concentration on special  
20 education.

12:08PM

12:08PM

12:08PM

21 A. Yes.

12:08PM

22 Q. You're reviewing documents and data and  
23 techniques that the regional GNETS programs are  
24 providing to you in their grant application. Do you use  
25 your background to communicate with the regional GNETS

12:08PM

12:08PM

12:08PM

12:08PM



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1 programs?

12:08PM

2 A. Within the grant application, I would not need  
3 to communicate that type of information, I would just  
4 need to make sure the information was inside of the  
5 grant application.

12:08PM

12:08PM

12:08PM

12:08PM

6 Q. What about in other parts of your role as GNETS  
7 program specialist?

12:08PM

12:08PM

8 A. I don't review that type of information.

12:08PM

9 Q. You don't review the type of information that  
10 would have been informed by your degree?

12:08PM

12:08PM

11 MS. JOHNSON: Objection.

12:08PM

12 THE WITNESS: I don't understand what  
13 you're saying.

12:08PM

12:09PM

14 Q. BY MS. TUCKER: Yes. I guess, you know, I --  
15 you have a few degrees that we went over earlier. You  
16 have a Master's, you have the EdD. I'm curious to how  
17 that background and that education informs your work in  
18 communicating with the regional GNETS program.

12:09PM

12:09PM

12:09PM

12:09PM

12:09PM

19 A. Well, GNETS is within special education and  
20 yes, I do have vast knowledge of special education.

12:09PM

12:09PM

21 Q. Yeah.

12:09PM

22 A. So when I'm asked within any role to provide  
23 that type of information and support, I do.

12:09PM

12:09PM

24 Q. Okay. And are you asked to do that?

12:09PM

25 A. On occasion.

12:09PM

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1	Q. What -- which of your responsibilities would	12:09PM
2	allow you to do that?	12:09PM
3	A. Whatever Vickie asks me to do.	12:09PM
4	Q. Can you give --	12:09PM
5	A. It just depends.	12:09PM
6	Q. Can you give me an example?	12:09PM
7	A. I would have to think about that.	12:09PM
8	Q. Okay. We can also give you time right now or	12:09PM
9	we can come back to it later.	12:10PM
10	A. We can come back to it. That would give me a	12:10PM
11	little bit more time.	12:10PM
12	Q. Okay. I'll make a note.	12:10PM
13	I see that you called or you spoke with	12:10PM
14	Derrick. Does that mean you called Derrick?	12:10PM
15	A. Yes.	12:10PM
16	Q. Are most of these types of conversations done	12:10PM
17	via phone call or are they ever e-mailed?	12:10PM
18	A. Phone call for clarity.	12:10PM
19	Q. Can you do -- can you share it through the	12:10PM
20	portal?	12:10PM
21	A. Share -- no.	12:10PM
22	Q. Okay.	12:10PM
23	A. We can e-mail but --	12:10PM
24	Q. Okay.	12:10PM
25	A. -- for clarity, it's best to call.	12:10PM

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1 Q. Okay. I'm going to hand you what was already  
2 introduced --

3 A. Okay.

4 Q. -- as Plaintiff's Exhibit 229.

5 (Previously marked Plaintiff's Exhibit 229  
6 introduced into evidence.)

7 THE WITNESS: (Witness examining document.)

8 Q. BY MS. TUCKER: Dr. Stevenson, am I correct  
9 that this is the fiscal year 2021 GNETS grant  
10 application for Rutland Academy?

11 A. Yes.

12 Q. Let's look at the first page together which has  
13 the Bates number of Rutland 002910. Under the heading  
14 that lists "Rutland Academy," there is a list of 12, it  
15 looks like topics under the form name. Do you see that?

16 A. Yes.

17 Q. Okay. And it begins with GNETS site location  
18 and ends with service delivery integration of services  
19 and capacity building.

20 A. (Witness examining document.)

21 Q. So do each of the regional GNETS programs  
22 provide information on these 12 topics in the grant  
23 application?

24 A. Yes.

25 Q. And you and/or Vickie assess the completion of

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1 each of these 12 topics?

12:12PM

2 A. Yes.

12:12PM

3 Q. Does anyone else look at any of the 12 topics?

12:12PM

4 A. No.

12:12PM

5 Q. Okay. Is there a checklist or a rubric to  
6 assess each topic within an application that you and  
7 Vickie use?

12:12PM

12:12PM

12:12PM

8 A. No.

12:12PM

9 Q. How do you know what to look for?

12:12PM

10 A. They have to have the information inside of the  
11 GrantApp. If that question is answered and this is  
12 information that they're providing, so it's what they're  
13 saying their program is doing.

12:12PM

12:12PM

12:12PM

12:12PM

14 Q. You know how Vickie in the last exhibit said he  
15 needed more information --

12:12PM

12:12PM

16 A. (Nodding yes.)

12:12PM

17 Q. -- when speaking to South Metro?

12:12PM

18 A. Mm-hmm.

12:12PM

19 Q. Would you also make that determination if  
20 someone needed more information?

12:12PM

12:12PM

21 A. Yes. In the tiered information, you have to  
22 provide more than just we have tiers.

12:12PM

12:13PM

23 Q. Okay.

12:13PM

24 A. So if he didn't provide the specifics requested  
25 within the grant application, then yes.

12:13PM

12:13PM

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1 Q. Do you and Vickie talk about any, like, common  
2 ground of when you know more information is needed for  
3 each topic?

4 MS. JOHNSON: Objection.

5 THE WITNESS: I mean, it just depends on  
6 when we're looking at something and she might have a  
7 question or I might have a question, then we'll just  
8 talk about it, but I couldn't give you like a blatant  
9 example, I guess.

10 Q. BY MS. TUCKER: So for GNETS site location, the  
11 first, what are you looking for in that application?

12 A. We're just looking to make sure -- or looking  
13 that they've put in their sites.

14 Q. And this is all the sites?

15 A. All the sites that they serve. And we only  
16 know that based on what they put in there.

17 Q. Do you compare it to last year's grant  
18 application to note if a center had closed or a  
19 different school-based classroom has popped up?

20 A. That's up to the directors to provide us with  
21 that information.

22 Q. So is it information you request?

23 A. It's in the GrantApp.

24 Q. Okay.

25 A. So --

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1 Q. It asks for new -- 12:14PM

2 A. It asks for whatever their site locations are 12:14PM

3 for that particular fiscal year. 12:14PM

4 Q. Sure. I guess I'm asking would you then look 12:14PM

5 back to 2020 and compare -- 12:14PM

6 A. No. 12:14PM

7 Q. -- the responses? 12:14PM

8 A. (Nodding no.) 12:14PM

9 Q. And then what do you look for, for projection 12:14PM  
10 by GNETS site location? 12:14PM

11 A. It's just them putting their projection. 12:14PM

12 There's really nothing. They just have to complete it. 12:14PM

13 Q. What about for staffing pattern, what does that 12:14PM  
14 mean? 12:14PM

15 A. Staffing pattern, that's self-populated. So it 12:14PM  
16 comes in from -- I forget the name of the report that is 12:15PM  
17 collected by the State for all staff, but that's 12:15PM  
18 prepopulated which is why you don't see a status 12:15PM  
19 complete because it's prepopulated. 12:15PM

20 Q. Thank you for answering that. That was going 12:15PM  
21 to be one of my questions. 12:15PM

22 A. Mm-hmm. 12:15PM

23 Q. Okay. And it's by some others -- 12:15PM

24 A. It's some other -- 12:15PM

25 Q. -- it's the GaDOE office? 12:15PM

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1 A. Right. And that feeds into there but it's 12:15PM  
2 something that every LEA has to do for staffing. 12:15PM

3 Q. Got it. What is looked at for student 12:15PM  
4 transition form? 12:15PM

5 A. That's just them putting in information on the 12:15PM  
6 number of students who have transitioned. 12:15PM

7 Q. What is meant by transitioned? 12:15PM

8 A. Whether they are going to school-based or 12:15PM  
9 whether they have transitioned out of the program, just 12:15PM  
10 wherever that -- wherever however many students have 12:15PM  
11 transitioned to something other than the program they're 12:15PM  
12 being served in. 12:15PM

13 Q. Is that in this? Let's look. 12:15PM

14 A. Yes, it is. 12:16PM

15 Q. What page? 12:16PM

16 A. I don't see it. It's near the back. 12:16PM

17 Q. Using the Bates number at the bottom? 12:16PM

18 A. Oh. 2923. 12:16PM

19 Q. Thank you. 12:16PM

20 A. So they enter that information. 12:16PM

21 Q. What do you look for, Vickie look for with this 12:16PM  
22 information? 12:16PM

23 A. We're just looking to see if it's completed, 12:16PM  
24 because we don't know unless they tell us what -- 12:16PM

25 Q. Right. 12:16PM

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1 A. -- so we wouldn't know what to look for unless 12:16PM  
2 they report. This is their self-report. 12:16PM

3 Q. Would you have questions if there were no 12:16PM  
4 transitions back to a home school? 12:16PM

5 A. No, because it's -- 12:16PM

6 MS. JOHNSON: Objection. 12:16PM

7 THE WITNESS: It's by district and it's 12:16PM  
8 individualized, so if the student didn't make progress 12:16PM  
9 to transition, then I -- no. 12:16PM

10 Q. BY MS. TUCKER: So are there any questions that 12:16PM  
11 would come up with looking at this form that Vickie and 12:16PM  
12 you would have for a regional GNETS program? 12:17PM

13 MS. JOHNSON: Objection. 12:17PM

14 THE WITNESS: Not that I can think of at 12:17PM  
15 this time. 12:17PM

16 Q. BY MS. TUCKER: Do you want us to come back to 12:17PM  
17 that later too? 12:17PM

18 A. No. 12:17PM

19 Q. We'll give you some time to think about it. 12:17PM

20 Okay. Going back to the front. The next 12:17PM  
21 is service delivery, behavioral support and therapeutic 12:17PM  
22 services. What are you and Vickie looking for? 12:17PM

23 A. We're just looking to make sure that the 12:17PM  
24 information is complete on the application. 12:17PM

25 Q. What information are you asking for? 12:17PM



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1 A. Whatever the questions are in the grant 12:17PM  
2 application. 12:17PM

3 Q. Do you want to point me to it since you're -- 12:17PM

4 A. 2921. 12:17PM

5 Q. Okay. So this is service delivery behavioral 12:17PM  
6 support and therapeutic services? 12:17PM

7 A. (Nodding yes.) 12:18PM

8 Q. So are the questions on 2921 and 2922 what 12:18PM  
9 you're looking at? 12:18PM

10 A. Yes. And she answered them. 12:18PM

11 Q. Do you look for the substance of the answers or 12:18PM  
12 just completion? 12:18PM

13 A. No. We look to see if she only put, you know 12:18PM  
14 -- we do PBIS, then, of course, is that all you do, do 12:18PM  
15 you do more than PBIS, that kind of question. 12:18PM

16 Q. Let's look at the crisis management. 12:18PM

17 A. (Witness complying.) 12:18PM

18 Q. Where is that? 12:18PM

19 A. (Witness examining document.) It should be 12:18PM  
20 before -- right before -- yeah, 2919. 12:18PM

21 Q. And this is 2919 through the top of -- or just 12:18PM  
22 2919? 12:19PM

23 A. Just 2919. 12:19PM

24 Q. Okay. What type of questions would you ask 12:19PM  
25 about this area of the GNETS grant application? 12:19PM

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1 A. I mean, just to make sure they've answered the 12:19PM  
2 questions. 12:19PM

3 Q. Are there any questions you would have -- or 12:19PM  
4 have you had any questions about responses to this as 12:19PM  
5 you're -- during your role as GNETS program specialist? 12:19PM

6 A. I mean, I would have to -- I don't know. It 12:19PM  
7 depends. As I'm reviewing them, I might have a 12:19PM  
8 question, but... 12:19PM

9 Q. What about service delivery severe behavioral 12:19PM  
10 management and deescalation? 12:19PM

11 A. And that's on the next page. 12:19PM

12 Q. Okay. 12:19PM

13 A. If they didn't list their training, you know, 12:19PM  
14 they have to talk about what kind of curriculum they 12:20PM  
15 used for deescalation and restraint. So just ensuring 12:20PM  
16 that information was in there. 12:20PM

17 Q. What curriculum do the regional GNETS program 12:20PM  
18 use? 12:20PM

19 A. Every program does something different, so it 12:20PM  
20 just depends. 12:20PM

21 Q. Does GaDOE provide the training on the 12:20PM  
22 deescalation strategies? 12:20PM

23 A. We do not. 12:20PM

24 Q. What about in the grant application under 12:20PM  
25 service delivery instructional and academic supports? 12:20PM

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1 A. That should be near the front. Yes. 2917. 12:20PM

2 Q. So here it says, "Instructions in Georgia 12:20PM

3 standards of excellence." 12:21PM

4 A. Yes. 12:21PM

5 Q. What is that? 12:21PM

6 A. That is the standards for the classrooms and 12:21PM

7 lessons within Georgia. 12:21PM

8 Q. Have -- what do you look for in this section? 12:21PM

9 A. That they've addressed the questions. 12:21PM

10 Q. Do you also look at their scores on any State 12:21PM

11 standard test? 12:21PM

12 A. I do not. 12:21PM

13 Q. You do not? 12:21PM

14 A. (Nodding no.) 12:21PM

15 Q. And outside of the GNETS grant application, are 12:21PM

16 you given any state assessment scores? 12:21PM

17 A. I am not. 12:21PM

18 Q. Do you know if Vickie is? 12:21PM

19 A. I don't know. 12:21PM

20 Q. So you monitor the i-Ready? 12:21PM

21 A. Yes. 12:21PM

22 Q. But what other academic type progress do you 12:21PM

23 monitor? 12:21PM

24 A. That's it. 12:21PM

25 Q. Under service delivery supplemental 12:21PM

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1	instruction?	12:21PM
2	A. Yes. Go back. Oh, it's out of order.	12:21PM
3	Q. Oh, is it?	12:22PM
4	A. I'm doing it like if I was looking at it.	12:22PM
5	MS. JOHNSON: 2915.	12:22PM
6	THE WITNESS: Yes. Okay.	12:22PM
7	Q. BY MS. TUCKER: So this is -- what is this	12:22PM
8	listing?	12:22PM
9	A. This is listing all of the reading	12:22PM
10	interventions this particular program is using, the math	12:22PM
11	interventions this program is using.	12:22PM
12	Q. Okay.	12:22PM
13	A. So they just have to say what type of	12:22PM
14	supplemental supports they're using.	12:22PM
15	Q. Does GaDOE ever make recommendations to the	12:22PM
16	regional GNETS program about --	12:22PM
17	A. No.	12:22PM
18	Q. -- supplemental reports?	12:22PM
19	A. I'm sorry.	12:22PM
20	Q. Supplemental instruction?	12:22PM
21	A. No.	12:22PM
22	Q. Does GaDOE fund i-Ready for the regional GNETS	12:22PM
23	programs?	12:23PM
24	A. Yes.	12:23PM
25	Q. What else does GaDOE fund for the regional	12:23PM

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1 GNETS programs given, like, program like this?

12:23PM

2 A. That's it.

12:23PM

3 Q. Just i-Ready?

12:23PM

4 A. Mm-hmm.

12:23PM

5 Q. What about Ingenuity?

12:23PM

6 A. Ingenuity?

12:23PM

7 Q. Yeah.

12:23PM

8 A. No. The State doesn't pay for that.

12:23PM

9 Q. Let's look at service delivery mental health

12:23PM

10 collaboration.

12:23PM

11 A. Excuse me. 2913.

12:23PM

12 Q. 2913?

12:23PM

13 A. Yes.

12:23PM

14 Q. Towards the front. So it says, "Describe any  
15 formal collaboration with community agencies."

12:23PM

12:23PM

16 A. (Nodding yes.)

12:23PM

17 Q. What do you-all look for here?

12:23PM

18 A. They just have to tell us what community  
19 agencies they collaborate with, so every program is  
20 different. So there is no standard for that.

12:23PM

12:23PM

12:23PM

21 Q. There's no standard?

12:23PM

22 A. No. They have -- they make their own  
23 collaborations with mental health.

12:23PM

12:24PM

24 Q. If there is a program that only lists one,  
25 would that be --

12:24PM

12:24PM

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1 A. That might be the only one they collaborate  
2 with.

3 Q. Would you all provide any feedback on that?

4 A. (Nodding no.)

5 Q. Do you-all provide any recommendations on --

6 A. (Nodding no.)

7 Q. -- the agencies?

8 A. No.

9 Q. And then service delivery personnel list?

10 A. And that's where we -- when I said earlier that  
11 the staffing pattern is prepopulated, the personnel is  
12 where they can confirm that that information is correct  
13 and make any changes.

14 Q. So the regional GNETS program does that?

15 A. Yes. So if a teacher is no longer there, they  
16 can delete her off of that list and it will change on  
17 the staffing pattern?

18 Q. And the last is, "Service delivery, integration  
19 of services, and capacity building."

20 A. Okay. Let me find that.

21 Q. Oh, you know what, I think it's missing from  
22 this.

23 A. Oh, okay.

24 Q. Yeah. So -- I didn't see it. Did you see it?

25 A. No. I didn't see it.

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1 Q. I think this is missing that, as well as the 12:25PM  
2 personnel list. Earlier you said the personnel list was 12:25PM  
3 prepopulated? 12:25PM

4 A. The staffing pattern. 12:25PM

5 Q. The staffing pattern? 12:25PM

6 A. Yeah. 12:25PM

7 Q. What would the integration of services and 12:25PM  
8 capacity building look like? 12:25PM

9 A. It has questions discussing -- if you look at 12:25PM  
10 the PowerPoint it will have it on there. I'm sorry. 12:25PM

11 Q. The PowerPoint on the grant application? 12:25PM

12 A. Yes. 12:25PM

13 Q. Which was Plaintiff's Exhibit? 12:25PM

14 A. 423. 12:25PM

15 Q. 420? 12:25PM

16 A. Three. 12:25PM

17 Q. Three. 12:25PM

18 MS. JOHNSON: 20. 12:26PM

19 THE WITNESS: What's the number? 12:26PM

20 MS. JOHNSON: 20. 12:26PM

21 THE WITNESS: 20. 12:26PM

22 Q. BY MS. TUCKER: So this is asking for numbers? 12:26PM

23 A. Yes. 12:26PM

24 Q. Do -- are you looking for completion, then, or 12:26PM  
25 do you and Vickie raise any questions regarding numbers? 12:26PM

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1 A. No, we don't really ask any questions. We 12:26PM  
2 might -- sometimes they make a mistake and they might, 12:26PM  
3 you know, put 300 and they meant to put 30, something 12:26PM  
4 like that. 12:26PM

5 Q. Got it. Going back to what was introduced as 12:26PM  
6 Plaintiff's Exhibit 229, the Rutland app. 12:26PM

7 A. Okay. 12:26PM

8 Q. Does this -- I know it's missing what we just 12:26PM  
9 discussed, but does it otherwise look like a typical 12:26PM  
10 GNETS grant application? 12:26PM

11 A. Yes. 12:27PM

12 Q. And it's in that same format now? 12:27PM

13 A. Mm-hmm, yes. 12:27PM

14 Q. Okay. And the same 12 topics are covered? 12:27PM

15 A. Yes. 12:27PM

16 Q. How does the grant application -- the answers 12:27PM  
17 in the grant application relate to funding? 12:27PM

18 MS. JOHNSON: Objection. 12:27PM

19 THE WITNESS: I don't know the answer to 12:27PM  
20 that. 12:27PM

21 Q. BY MS. TUCKER: Do you know if the grant 12:27PM  
22 application numbers relate to funding? 12:27PM

23 A. I don't know. 12:27PM

24 Q. Let's move on. 12:27PM

25 MS. TUCKER: I'm handing the Court Reporter 12:28PM



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1 what's going to be Plaintiff's Exhibit 425.

12:28PM

2 (Plaintiff's Exhibit 425 marked for  
3 identification.)

12:28PM

12:28PM

4 Q. BY MS. TUCKER: The Bates number on the first  
5 page of this document is GA00946723. This is a  
6 May 15th, 2019 e-mail from Vickie Cleveland to the  
7 regional program GNETS directors, and you are copied.  
8 The subject reads: "Assurances." And there are two  
9 attachments.

12:28PM

12:28PM

12:28PM

12:28PM

12:28PM

12:28PM

10 A. (Witness examines document.)

12:28PM

11 Q. Dr. Stevenson, do you recognize this e-mail?

12:28PM

12 A. Yes.

12:29PM

13 Q. Sorry, what was that?

12:29PM

14 A. Yes.

12:29PM

15 Q. Dr. Stevenson, what are assurances?

12:29PM

16 A. The information on the paper.

12:29PM

17 Q. What is your understanding of what assurances  
18 are, these assurances related to the GNETS application?

12:29PM

12:29PM

19 A. It lists things that the RESAs and the LEAs are  
20 assuring, meaning physical agents for GNETS.

12:29PM

12:29PM

21 Q. Are these assigned prior to the GNETS grant  
22 application being approved or after?

12:29PM

12:29PM

23 A. They're uploaded within the grant application.

12:29PM

24 Q. Within the application?

12:29PM

25 A. Yes. And I think to the ConApp also.

12:29PM

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1 Q. Okay. And are these between -- so the first  
2 one, beginning with GA00946724 --

3 A. Mm-hmm.

4 Q. This is between RESA and GaDOE; is that  
5 correct?

6 A. It's between RESA and the GNETS.

7 Q. RESA and the GNETS program. Okay. And then  
8 the other one is the GA00946726. That's between the LEA  
9 and --

10 A. The GNETS.

11 Q. The regional GNETS programs?

12 A. Yes.

13 Q. Do the regional GNETS programs sign any  
14 assurances with GaDOE?

15 A. No.

16 Q. To receive their funding?

17 A. The assurances that are built into the Con  
18 application.

19 Q. In the Con application?

20 A. Mm-hmm. The budget assurances.

21 Q. Are there separate assurances in the GNETS  
22 grant application?

23 A. No.

24 Q. Okay. Do you have any role with regard to  
25 these assurances?

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1	A. No.	12:30PM
2	Q. Does GaDOE review for compliance with the GNETS	12:30PM
3	grant?	12:30PM
4	MS. JOHNSON: Objection.	12:31PM
5	THE WITNESS: What do you mean?	12:31PM
6	Q. BY MS. TUCKER: We just went through and there	12:31PM
7	was the supplemental instruction and there were	12:31PM
8	different programs listed. Does GaDOE --	12:31PM
9	UNKNOWN SPEAKER: I have a couple of	12:31PM
10	questions for you.	12:31PM
11	MS. TUCKER: Hold on. Who is it?	12:31PM
12	UNKNOWN SPEAKER: I just got a notice that	12:31PM
13	my insurance for the insurance --	12:31PM
14	THE VIDEOGRAPHER: Let's go off the record.	12:31PM
15	Off the record at 12:32 p.m.	12:31PM
16	(Off the record.)	12:31PM
17	THE VIDEOGRAPHER: Stand by, everybody.	12:36PM
18	Back on the record at 12:38 p.m.	12:36PM
19	Q. BY MS. TUCKER: Okay. Just going back to --	12:36PM
20	with the grant and GaDOE's review after a grant	12:37PM
21	application is submitted.	12:37PM
22	A. (Nodding yes.)	12:37PM
23	Q. Do you ever take steps to ensure that what is	12:37PM
24	on the grant is happening at the regional programs?	12:37PM
25	MS. JOHNSON: Objection.	12:37PM

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1 THE WITNESS: No. I can't -- I can't 12:37PM  
2 recall. 12:37PM  
3 Q. BY MS. TUCKER: Why not? 12:37PM  
4 A. It's -- if -- what do you mean take steps? 12:37PM  
5 Q. I guess, you know, you're approving the grant 12:37PM  
6 application and you're approving what they've written 12:37PM  
7 down that they'll provide. I'm curious whether you then 12:37PM  
8 take steps to ensure what they attested to is happening? 12:37PM  
9 A. They submit attachments, so, as evidence to 12:37PM  
10 some of the things to support it, much like in a 12:37PM  
11 strategic plan. So just based on what is provided in 12:37PM  
12 the evidence. 12:38PM  
13 Q. But mid-year would you go and check to see if 12:38PM  
14 certain things are happening that have been -- 12:38PM  
15 A. (Nodding no.) 12:38PM  
16 Q. I'm sorry? 12:38PM  
17 A. No. 12:38PM  
18 Q. Does anyone else at GaDOE review the 12:38PM  
19 applications for compliance? 12:38PM  
20 MS. JOHNSON: Objection. 12:38PM  
21 THE WITNESS: The grant application? 12:38PM  
22 Q. BY MS. TUCKER: Mm-hmm. 12:38PM  
23 A. No. 12:38PM  
24 Q. To see later if that's what they -- the GNETS 12:38PM  
25 programs are doing? 12:38PM

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1 A. No. 12:38PM

2 Q. Does anyone else at GaDOE -- does any other 12:38PM  
3 State agency review the regional GNETS programs in 12:38PM  
4 conjunction with the grant application? 12:38PM

5 MS. JOHNSON: Objection. 12:38PM

6 THE WITNESS: I'm not aware. 12:38PM

7 Q. BY MS. TUCKER: Has any State agency reviewed 12:38PM  
8 the GNETS program in general? 12:38PM

9 MS. JOHNSON: Objection. 12:38PM

10 THE WITNESS: What do you mean review? Are 12:38PM  
11 you talking about the grant application? 12:38PM

12 Q. BY MS. TUCKER: No, I'm just talking about the 12:38PM  
13 GNETS program now. Has any State agency reviewed your 12:38PM  
14 processes? 12:38PM

15 MS. JOHNSON: Objection. 12:38PM

16 THE WITNESS: I'm not sure. 12:39PM

17 Q. BY MS. TUCKER: You're not aware? 12:39PM

18 A. No, I'm not aware. 12:39PM

19 Q. Are you aware of any audit of your office or 12:39PM  
20 the GNETS program? 12:39PM

21 A. I'm not aware. 12:39PM

22 Q. Are you -- have you heard of the 2010 audit? 12:39PM

23 A. I wasn't even anywhere near the State in 2010 12:39PM  
24 so I don't know. 12:39PM

25 Q. Okay. Let's speak a little bit more about the 12:39PM

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1 strategic plan, and your consultation with the regional  
2 GNETS programs on the strategic plan.

3 A. Okay.

4 Q. What is the timeline of strategic review plan?  
5 We just talked about the grant application timeline?  
6 What is this timeline?

7 A. Well, we no longer review the strategic plan in  
8 a way in which there is a timeline because we've made  
9 changes. So the grant application and strategic plan  
10 are now aligned. So the information that we would look  
11 for in the strategic plan, they are attaching within the  
12 grant application. So there is not a review as it was  
13 in previous years. They do the end-of-year summary from  
14 the strategic plan and the mid-year summary where they  
15 rate themselves and make priorities for the different  
16 areas, but we no longer go and sit and do reviews as in  
17 the past.

18 Q. When did that happen?

19 A. This is 2022. It was either 2020 or 2021. I'm  
20 not sure.

21 Q. So what is the strategic review plan? What  
22 does it look like now, then?

23 A. It looks the same. It's still the framework.  
24 It's still the framework for the program and the  
25 framework for their programs. And it still has actions

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1 and things, but we're just not rating and reviewing the  
2 strategic plan because now they're aligned -- it's  
3 aligned with the GrantApp. So if you look at the grant  
4 application and the strategic plan, you will see a lot  
5 of the same information.

6 Q. But they still complete it in both places?

7 A. No, they no longer have to complete the grant  
8 application in the portal. I mean, I'm sorry, the  
9 strategic plan. They still have to complete the grant  
10 application.

11 Q. Okay. So the strategic plan in 2020 or 2021 no  
12 longer has to be completed?

13 A. In the portal.

14 Q. In the portal.

15 A. They still have to have their strategic plan  
16 information as a part of the framework for their  
17 programs available, but we no longer require it to be  
18 upload -- uploaded in the portal.

19 Q. Why is that? What made the change?

20 A. To streamline the process when a lot of the  
21 information aligns with information that is requested  
22 within the grant application.

23 Q. Okay. And then how do you receive the  
24 strategic plan from the programs if it's not in the  
25 portal?

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1 A. We do not receive the strategic plan. We  
2 receive the summary.

3 Q. Uh-huh.

4 A. Mid-year and end-year summary. It's a one  
5 pager.

6 Q. Mm-hmm.

7 A. And it is uploaded within the grant  
8 application.

9 Q. Are you -- earlier when we spoke about the  
10 strategic plan, I believe you said that there were  
11 ratings of emerging, operational, and evident?

12 A. When we used to review the strategic plan and  
13 go out and do the reviews and it was uploaded in the  
14 portal, yes.

15 Q. And now when you receive the mid-year summary  
16 and end-of-year summary?

17 A. They're rating themselves.

18 Q. And does GaDOE provide --

19 A. No.

20 Q. -- a rating?

21 A. No.

22 Q. And this happened in the last two years?

23 A. Mm-hmm.

24 Q. Do you -- does GaDOE provide any feedback  
25 related to the mid-year summary or end of the year



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1 summary?

12:43PM

2 A. We meet with the -- this year, and that's what  
3 I was referring to earlier, we meet with each individual  
4 program. We just started, so this is new this year.

12:43PM

12:43PM

12:43PM

5 Q. Mm-hmm.

12:43PM

6 A. And we've only done about, maybe six, so far.  
7 And we review their end-of-year summary, and we just ask  
8 them to talk to us about why they rated themselves a  
9 certain rating for each section.

12:43PM

12:43PM

12:43PM

12:43PM

10 Q. Okay. And maybe -- sorry, I might have  
11 misunderstood, though. You said it's new this year but  
12 it's -- go ahead. You're ready to clarify.

12:43PM

12:43PM

12:43PM

13 A. Oh, no. Go ahead.

12:43PM

14 Q. You said this was new this year.

12:44PM

15 A. Mm-hmm.

12:44PM

16 Q. But then earlier you said that the change came  
17 in 2020. I'm just trying to understand what's happened.

12:44PM

12:44PM

18 A. So the change I was referring to was the change  
19 as far as us not reviewing the strategic plan in the  
20 portal, as we did in the past. Now what I'm referring  
21 to is reviewing the summary, specifically that's  
22 uploaded within the GrantApp.

12:44PM

12:44PM

12:44PM

12:44PM

12:44PM

23 Q. And that is new as of this year?

12:44PM

24 A. That is new as of this year.

12:44PM

25 Q. So you will review a mid-year summary?

12:44PM

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1 A. Mid-year and end-of-year, but we review it all 12:44PM  
2 at the same time. 12:44PM

3 Q. At the end of the year? 12:44PM

4 A. Yes. 12:44PM

5 Q. So you -- go ahead. 12:44PM

6 A. To see if they've made changes from -- they 12:44PM  
7 explain why they've made changes from mid to end. 12:44PM

8 Q. So does GaDOE provide any feedback at that 12:44PM  
9 time? 12:44PM

10 A. No. 12:44PM

11 Q. What is the purpose of the review? 12:44PM

12 A. It's just for them to discuss with us why; so 12:44PM  
13 you rated yourself a 1, as a priority for behavioral 12:44PM  
14 therapeutics, why is behavior therapeutics a 1 priority 12:45PM  
15 for you, and they talk about why. And just talk about 12:45PM  
16 some of the things that they're doing with that. So 12:45PM  
17 it's for further conversation. 12:45PM

18 Q. What does it lead to? 12:45PM

19 MS. JOHNSON: Objection. 12:45PM

20 THE WITNESS: Well, if you're reading it on 12:45PM  
21 paper, sometimes on paper it doesn't come across when 12:45PM  
22 you have a conversation, so it's for clarity. 12:45PM

23 Q. BY MS. TUCKER: For clarity? 12:45PM

24 A. Mm-hmm. Reading it and talking about it are 12:45PM  
25 two different things. You get a better picture. 12:45PM

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1 Q. And what is the reason that you and Vickie  
2 Cleveland are having these conversations, then, just for  
3 clarity, for what reason?

4 A. Because this is what they've rated themselves,  
5 based on the framework, and you would need to know why  
6 did you rate yourselves this way. For clarity, like I  
7 said. You read something on paper, it's very different  
8 than having a conversation sometimes.

9 Q. Is it tied to them receiving any funding?

10 A. No.

11 Q. Okay.

12 MS. TUCKER: I am going to pass this to the  
13 Court Reporter, and I'd like her to mark it as  
14 Plaintiff's Exhibit 426.

15 (Plaintiff's Exhibit 426 marked for  
16 identification.)

17 THE WITNESS: (Witness examining document.)

18 Q. BY MS. TUCKER: Okay. The Bates number on the  
19 first page of this document is GA00955852. This is a  
20 March 19th, 2020 e-mail you from to Vickie Cleveland.  
21 The subject reads: "Flint notes." And there is one  
22 attachment titled: "Flint strategic plan notes,  
23 March 2020."

24 Dr. Stevenson, do you recognize this  
25 e-mail?

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1 A. I do.

12:47PM

2 Q. Okay. Do you recognize the notes attached to  
3 it?

12:47PM

12:47PM

4 A. I do.

12:47PM

5 Q. So let's go back to the e-mail. Do you see  
6 where you say that you've attached the notes from the  
7 Flint review. Is this referring to the Flint Area  
8 Learning Program strategic plan review?

12:47PM

12:47PM

12:47PM

12:47PM

9 A. It is. Yes.

12:47PM

10 Q. Okay. And this was from 2020, so this was a  
11 past practice?

12:47PM

12:47PM

12 A. Yes.

12:47PM

13 Q. But I still would like to learn about it.

12:47PM

14 A. Okay.

12:47PM

15 Q. At what point in the strategic plan review  
16 timeline were these notes created? Like when --

12:47PM

12:47PM

17 A. During the strategic plan review.

12:47PM

18 Q. And did they have a mid-year and end-of-year in  
19 2020 as well?

12:47PM

12:48PM

20 A. It's within the strategic plan, yes.

12:48PM

21 Q. I don't think I understand. So the date of  
22 review is March 11th, 2020.

12:48PM

12:48PM

23 A. Yes. So if you have a copy of the strategic  
24 plan, once you get to the end of it, there is a mid-year  
25 and there is an end-of-year. So this is when we were

12:48PM

12:48PM

12:48PM

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1 doing total reviews for the strategic plan.

12:48PM

2 Q. Mm-hmm.

12:48PM

3 A. And we were providing the rating of  
4 operational, emerging, or not evident.

12:48PM

12:48PM

5 Q. Okay. And these are your notes where -- in  
6 this document?

12:48PM

12:48PM

7 A. Yes.

12:48PM

8 Q. Okay. And was this -- did you create this  
9 rubric or did this rubric exist?

12:48PM

12:48PM

10 A. This rubric already existed.

12:48PM

11 Q. Okay. And is it aligned with the strategic  
12 plan?

12:48PM

12:48PM

13 A. Yes.

12:48PM

14 Q. And are these notes after you reviewed  
15 documents or after you attended a meeting with Flint  
16 Area Learning Program?

12:48PM

12:48PM

12:49PM

17 A. So those things happened at the same time. So  
18 that was -- we went through each section of the  
19 strategic plan and talked about whatever they wanted to  
20 share about that, and they provided documentation or  
21 artifacts to support what they said they were doing.

12:49PM

12:49PM

12:49PM

12:49PM

12:49PM

22 Q. And then would Vickie Cleveland have her own  
23 set of notes?

12:49PM

12:49PM

24 A. If we were both there, yes.

12:49PM

25 Q. Okay. And then are the scores represented here

12:49PM

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1 the scores that you and Vickie gave or are these the  
2 self-assessed scores?

3 A. These are the scores that we gave, or the  
4 ratings.

5 Q. Ratings, yes. The non-numerical ratings.

6 A. (Nodding yes.)

7 Q. What guides you -- what guided you in the past,  
8 since you don't do this anymore --

9 A. Mm-hmm.

10 Q. -- to select these ratings?

11 A. There's a rubric.

12 Q. There's a rubric then?

13 A. (Nodding yes.)

14 Q. Okay. And what does that rubric detail?

15 A. Operational, emerging, not evident. If you're  
16 operational, then you have met all the standards within  
17 that. So this doesn't describe -- this is just what we  
18 use to take notes.

19 Q. Okay.

20 A. So if you have a copy of the whole strategic  
21 plan, it will give you more details about how that is.

22 Q. Okay. So the strategic plan, the same rubric,  
23 that's the regional programs used --

24 A. Yes.

25 Q. -- is the same -- is the same data?

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1 A. Yes. 12:50PM

2 Q. Okay. So you based your scores off of the 12:50PM  
3 rating rubrics within the GNETS regional -- or the GNETS 12:50PM  
4 strategic plans? 12:50PM

5 A. Yes. 12:50PM

6 Q. Did you -- when you reviewed other programs, 12:50PM  
7 did you also have notes like this? 12:50PM

8 A. Yes. 12:50PM

9 Q. And then you would discuss with Vickie or would 12:50PM  
10 you all make the scores in front of the regional GNETS 12:50PM  
11 programs? 12:51PM

12 A. We would discuss with Vickie. 12:51PM

13 Q. Yeah. 12:51PM

14 A. Vickie and I would discuss, yeah. 12:51PM

15 Q. Okay. And then what would have happened after 12:51PM  
16 you took these notes and selected these ratings? 12:51PM

17 A. We would enter it into the portal. 12:51PM

18 Q. And -- 12:51PM

19 A. The ratings, and then the GNETS directors would 12:51PM  
20 get notice that their information was in the portal. 12:51PM

21 Q. What -- what happened in the past when someone 12:51PM  
22 had a non-evident or an emerging when a regional program 12:51PM  
23 had a score that wasn't operational? 12:51PM

24 A. They would receive -- within the portal, they 12:51PM  
25 would receive a notice that they were emerging in those 12:52PM

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1 areas.

12:52PM

2 Q. What steps were required next?

12:52PM

3 MS. JOHNSON: Objection.

12:52PM

4 THE WITNESS: As far as what? What steps  
5 for the GNETS directors or ...

12:52PM

12:52PM

6 Q. BY MS. TUCKER: Yes. Are there any steps that  
7 a regional GNETS director would be -- would take if they  
8 received an emerging score or a not evident score?

12:52PM

12:52PM

12:52PM

9 A. They might provide additional information.

12:52PM

10 Q. To you?

12:52PM

11 A. They might upload, if it was a face-to-face.

12:52PM

12 Some of them was also virtual. So if it was a

12:52PM

13 face-to-face review, then they might upload -- they

12:52PM

14 might not have been able to put their hands on something

12:52PM

15 at the time and they uploaded it and then they could be

12:52PM

16 operational.

12:52PM

17 Q. So a rating could change?

12:52PM

18 A. Yes.

12:52PM

19 Q. Would you and Vickie give technical assistance  
20 to a program if you were concerned about their low  
21 scores, low ratings?

12:52PM

12:52PM

12:53PM

22 A. Well, it starts within the technical assistance  
23 as far as these -- some specifics to these things would  
24 be provided within their LEA, within their collaborative  
25 community, not necessarily from Vickie and myself.

12:53PM

12:53PM

12:53PM

12:53PM



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1 Q. Okay. Were these ratings tied to anything? 12:53PM

2 A. No. 12:53PM

3 Q. What would have happened if someone -- a 12:53PM  
4 regional program had all emergings and not evident? 12:53PM

5 MS. JOHNSON: Objection. 12:53PM

6 THE WITNESS: I can't say because I've 12:53PM  
7 never had that happen. 12:53PM

8 Q. BY MS. TUCKER: You never had that -- 12:53PM

9 A. Since I've been with the program. 12:53PM

10 Q. And you've been with the program the entire 12:53PM  
11 time it's had the operational, emerging, and not evident 12:53PM  
12 because before it was numerical? 12:53PM

13 A. Right. 12:53PM

14 Q. Do you and Vickie have conversations with the 12:54PM  
15 regional GNETS program -- I know you said they're 12:54PM  
16 uploaded into the portal, but afterwards about their 12:54PM  
17 scores, ratings? 12:54PM

18 A. A lot of times a conversation was happening 12:54PM  
19 within the review so -- 12:54PM

20 Q. Okay. 12:54PM

21 A. So there wasn't a lot of follow up needed. 12:54PM

22 MS. TUCKER: I'd like the Court Reporter to 12:54PM  
23 mark this document as Plaintiff's Exhibit 427. 12:54PM

24 (Plaintiff's Exhibit 427 marked for 12:54PM  
25 identification.) 12:54PM

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1 Q. BY MS. TUCKER: The Bates number on the first 12:54PM  
2 page of the document is GA00960449. This is a 12:54PM  
3 September 9th, 2020, e-mail from you to two e-mail 12:55PM  
4 addresses with the domain at tcjackets.net, and Shawn 12:55PM  
5 Owen and Vickie Cleveland and you were copied. 12:55PM

6 A. (Witness examining document.) 12:55PM

7 Q. The subject reads: "State suggested revision 12:55PM  
8 on action items for Pathways Educational Program GNETS 12:55PM  
9 strategic plan." 12:55PM

10 Dr. Stevenson, do you recognize this 12:55PM  
11 e-mail? 12:55PM

12 A. This is a generated e-mail. It's not one I 12:55PM  
13 typed. 12:55PM

14 Q. Oh. Can you explain that to me? 12:55PM

15 A. So in the portal, this is in 2020, so this was 12:55PM  
16 a virtual review that took place cause by September, 12:55PM  
17 that was COVID. 12:55PM

18 Q. Okay. 12:55PM

19 A. And the reviews were virtual. So once the 12:55PM  
20 information is put in and I hit submit, she needed a 12:55PM  
21 revision, and it automatically sends it. So it's not 12:55PM  
22 something that -- it's not an e-mail I typed myself. 12:55PM

23 Q. I understand. So this happens when you put it 12:56PM  
24 in other -- for other regional GNETS programs too? 12:56PM

25 A. So if they needed a revision on their strategic 12:56PM

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1 plan, it would say what section, what action item and  
2 the finding.

3 Q. Okay.

4 A. But I didn't type the e-mail, no. It's auto  
5 generated.

6 Q. Sure. Would the finding where it says "Section  
7 action item finding,"-- excuse me, would you have typed  
8 what's in after the finding into the portal and that  
9 would have then --

10 A. Yes. I just --

11 Q. -- been --

12 A. Yeah, that's it.

13 Q. Okay. So you, for example, for Section 2,  
14 behavioral support and therapeutic services, your  
15 finding was, and you wrote upload PBIS agendas, and  
16 upload evidence of how red areas and self-assessments  
17 were addressed?

18 A. Yes.

19 Q. Okay. What is meant by red areas?

20 A. So that means that the red area -- so the  
21 self-assessment that I was talking about at the end of  
22 the strategic plan review, if her areas were marked red,  
23 they were areas of need, so how were you -- how was she  
24 going to address those.

25 Q. And that would ultimately affect their rating?

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1 A. Well, I'm not sure if I gave them a rating if 12:57PM  
2 they hadn't completely uploaded everything yet. 12:57PM

3 Q. I see Shawn Owen is copied. 12:57PM

4 A. Shawn is always copied on all auto-generated 12:57PM  
5 because she's the deputy. 12:57PM

6 Q. Okay. 12:57PM

7 A. Anything that comes out of the portal to the -- 12:57PM  
8 to any -- not just with GNETS, with anybody. 12:57PM

9 Q. So she's getting lots of e-mails? 12:57PM

10 A. Yes. 12:57PM

11 Q. Have you or Vickie ever discussed any 12:57PM  
12 feedbacks -- feedback related to the GNETS strategic 12:57PM  
13 plan with Shawn Owen? 12:57PM

14 A. Not that I can recall. Not that I've been 12:57PM  
15 involved. 12:57PM

16 Q. Okay. And then what -- the domain was at 12:57PM  
17 tcjackets.net. Do you know who this was sent to? 12:57PM

18 A. I believe -- that's Pathways. 12:58PM

19 Q. Pathways. Which is one of the 24 regional 12:58PM  
20 GNETS? 12:58PM

21 A. Mm-hmm. 12:58PM

22 Q. Yes? 12:58PM

23 A. Yes. I'm sorry. 12:58PM

24 Q. And then -- so similar e-mails like this went 12:58PM  
25 out to the other regional GNETS programs? 12:58PM

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1 A. If they needed revision, yes. 12:58PM

2 Q. Okay. Do you give them a timeline on when to 12:58PM  
3 resubmit? 12:58PM

4 A. Yes. I'm not sure what the timeline was at 12:58PM  
5 that time, though. 12:58PM

6 Q. And does this function still exist given the 12:58PM  
7 change in the strategic plan? 12:58PM

8 A. No, because we no longer do it like this, so 12:58PM  
9 no. 12:58PM

10 Q. Okay. If it's okay, I just have one document 12:58PM  
11 to look at and then we can break. 12:58PM

12 A. Okay. 12:58PM

13 Q. Okay. 12:58PM

14 MS. TUCKER: I'd like the Court Reporter to 12:59PM  
15 mark this document as Plaintiff's Exhibit 428. 12:59PM

16 (Plaintiff's Exhibit 428 marked for 12:59PM  
17 identification.) 12:59PM

18 Q. BY MS. TUCKER: The Bates number on the first 12:59PM  
19 page of this document is GA00963511. This is an e-mail 12:59PM  
20 thread with the most recent e-mail dated November 30th, 12:59PM  
21 2020. And it's an e-mail from you to Moria Lenka, 12:59PM  
22 Upendra Nara, Vickie Cleveland, and -- 12:59PM

23 A. Udia. 12:59PM

24 Q. Udia. Thank you. Udia Arumugam. Did I get 12:59PM  
25 that close? 12:59PM

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1	A. Close enough.	12:59PM
2	Q. Okay. It's spelled A-R-U-M-U-G-A-M.	12:59PM
3	The subject reads: "Draft Coastal Academy	01:00PM
4	FY '20 strategic plan results."	01:00PM
5	Dr. Stevenson, do you recognize this	01:00PM
6	e-mail?	01:00PM
7	A. Yes.	01:00PM
8	Q. Let's go through the two fields. Who -- can	01:00PM
9	you identify the folks listed in the two fields?	01:00PM
10	A. They are Moria, Upendra, and Udia.	01:00PM
11	Q. Okay.	01:00PM
12	A. They are all IT.	01:00PM
13	Q. Okay. And let's start with the oldest e-mail	01:00PM
14	in the thread, which begins on GA00963514.	01:00PM
15	A. (Witness complying.)	01:00PM
16	Q. Do you see it's sent Tuesday, November 24th,	01:00PM
17	2020 at 1459?	01:00PM
18	A. Mm-hmm.	01:00PM
19	Q. And it starts with, "Dear Lisa Futch"?	01:00PM
20	A. Mm-hmm.	01:00PM
21	Q. Was that a yes?	01:00PM
22	A. Yes. I'm sorry.	01:00PM
23	Q. Who is Lisa Futch?	01:00PM
24	A. Director in the GNETS program for Coastal	01:01PM
25	Academy.	01:01PM

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1 Q. Okay. And why is Moria working on this e-mail? 01:01PM

2 A. This is the e-mail that would go out to 01:01PM  
3 everybody at the end of the strategic plan review. It 01:01PM  
4 would be auto-generated. So we had to create a sample 01:01PM  
5 so they could put it in the portal so it can be 01:01PM  
6 auto-generated on everyone at the end of the strategic 01:01PM  
7 plan review. 01:01PM

8 Q. Okay. And you created this sample? 01:01PM

9 A. I'm not sure if I created it or Vickie. I 01:01PM  
10 don't know. 01:01PM

11 Q. You or Vickie, but not Moria? 01:01PM

12 A. No. 01:01PM

13 Q. Okay. And then when -- does this still happen? 01:01PM

14 A. No. 01:01PM

15 Q. This letter no longer reaches the regional 01:01PM  
16 GNETS programs? 01:01PM

17 A. Because we no longer do it in the portal. 01:01PM

18 Q. Going back to this time, at the top paragraph 01:01PM  
19 of this e-mail, it reads: "At the end of the year, the 01:01PM  
20 teams completed their final ratings and prepared for a 01:02PM  
21 virtual review from the GNETS state program manager." 01:02PM

22 A. Where are we looking? I'm sorry. 01:02PM

23 Q. At the top paragraph of the e-mail, the oldest 01:02PM  
24 e-mail, the one that had the Tuesday, November 24th at 01:02PM  
25 1459. Let me find it. It's the last sentence of the 01:02PM

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1 first paragraph. Do you see it?

01:02PM

2 MS. JOHNSON: (Indicating.)

01:02PM

3 THE WITNESS: Okay. Yes. I'm sorry.

01:02PM

4 Q. BY MS. TUCKER: I can read it again. "At the  
5 end of the school year, the teams completed their final  
6 ratings and prepared for a virtual review from the GNETS  
7 state program manager and program specialist."

01:02PM

01:02PM

01:02PM

01:02PM

8 A. Mm-hmm.

01:02PM

9 Q. When this was drafted in 2020, was it going out  
10 to every program?

01:02PM

01:02PM

11 A. The programs that received the virtual review.

01:02PM

12 Q. How many programs received the virtual review?

01:02PM

13 A. I don't remember.

01:02PM

14 Q. It was not all 24?

01:02PM

15 A. Not in 2020.

01:03PM

16 Q. How was it decided which programs received  
17 virtual review?

01:03PM

01:03PM

18 A. Well, we weren't doing in-person, so that's how  
19 that was decided.

01:03PM

01:03PM

20 Q. But what about the number of programs?

01:03PM

21 A. We decided to be in line with the RDA unit, and  
22 they do Cross Functioning Monitoring on a three-year  
23 cycle.

01:03PM

01:03PM

01:03PM

24 Q. Okay.

01:03PM

25 A. So to be on -- to be in line with them, we went

01:03PM



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1 to a three-year cycle.

2 Q. So the 24 programs were divided into three  
3 groups?

4 A. (Nodding yes.)

5 Q. But now it's every year, every program?

6 A. The strategic plan review is no longer reviewed  
7 in this way. The grant application is every year every  
8 program.

9 Q. As well as the mid-year and end-of-year  
10 summary?

11 A. They upload that within the grant application.

12 Q. Got it. So let's look at the bottom paragraph  
13 on the same e-mail. It read: "The goal of the review  
14 process was to determine how well each team implemented  
15 the strategic plan components with the fidelity. If the  
16 evidence presented clearly supported the implementation  
17 of the components, an operational rating was assigned.  
18 If the evidence did not clearly support the  
19 implementation of the components, ratings were assigned  
20 to more accurately reflect the level of implementation."

21 And then what evidence are they speaking to  
22 here?

23 A. Within the strategic plan there were evidence  
24 for each aspect that they needed to show. So it depends  
25 on what part of the strategic plan you're looking at.

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1 There's different types of evidence based on each of the 01:04PM  
2 six focus areas. 01:04PM

3 Q. Six. Okay. And then let's go to the 01:04PM  
4 November 30th e-mail with the time stamp of 12:57, which 01:05PM  
5 is on the page that -- at the bottom the Bates reads 01:05PM  
6 GA00963512. 01:05PM

7 A. Okay. 01:05PM

8 Q. You write: "I need to add comments to two 01:05PM  
9 sites that received emerging scores, DeKalb and Rutland. 01:05PM  
10 Can you please open these two for me and I will make 01:05PM  
11 those changes." 01:05PM

12 What did you mean? What did you want 01:05PM  
13 opened? 01:05PM

14 A. The grant -- the strategic plan. 01:05PM

15 Q. Okay. What comments did you provide? 01:05PM

16 A. I don't know. 01:05PM

17 Q. If a program -- you know -- you were on a 01:05PM  
18 three-year cycle, you just said. So if a GNETS program, 01:05PM  
19 regional GNETS program was not being reviewed that year 01:06PM  
20 by you, were they still doing the self-assessment? 01:06PM

21 A. They were instructed to. 01:06PM

22 Q. Was it still sent anywhere? 01:06PM

23 A. I don't recall if we were asking them to upload 01:06PM  
24 it within the grant application at that time. I don't 01:06PM  
25 recall. 01:06PM

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1	MS. TUCKER: Okay. Let's break.	01:06PM
2	THE VIDEOGRAPHER: Okay. Off the record at	01:06PM
3	1:07 p.m.	01:06PM
4	(Off the record.)	01:06PM
5	THE VIDEOGRAPHER: Stand by. Okay. We're	02:03PM
6	back on the record at 2:04 p.m.	02:03PM
7	Q. BY MS. TUCKER: Okay. Hi, Dr. Stevenson.	02:03PM
8	A. Hi.	02:03PM
9	Q. Again, like, last time, after we take a break,	02:03PM
10	the ground rules still stay the same. The abbreviations	02:03PM
11	we discussed are the same.	02:03PM
12	A. Okay.	02:03PM
13	Q. And I'll just remind you that you are under	02:03PM
14	oath, so everything that you're testifying to is as if	02:03PM
15	you're in a court of law.	02:03PM
16	A. Okay.	02:03PM
17	Q. Okay. Any questions before we begin?	02:03PM
18	A. No.	02:03PM
19	Q. So earlier you testified that there are monthly	02:03PM
20	meetings, generally, with the regional GNETS program	02:04PM
21	directors?	02:04PM
22	A. Yes.	02:04PM
23	Q. Correct?	02:04PM
24	A. Yes.	02:04PM
25	Q. Okay. And are these meetings attended by only	02:04PM

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1 the GNETS directors or other regional GNETS program 02:04PM  
2 staff involved? 02:04PM

3 A. Only the GNETS directors unless the GNETS 02:04PM  
4 director cannot attend and they assign a designee such 02:04PM  
5 as an assistant director or coordinator. 02:04PM

6 Q. Okay. How often do you communicate with the 02:04PM  
7 regional GNETS directors other than through these 02:04PM  
8 meetings? 02:04PM

9 A. Only if they have a question that I'm 02:04PM  
10 responding to or if I need to send a reminder about 02:04PM  
11 submitting logs or something of that nature, but that's 02:04PM  
12 about it. 02:04PM

13 Q. Would you say that you're e-mailing regional 02:04PM  
14 GNETS directors on a weekly basis? 02:04PM

15 A. Not as a whole. Individually, if someone 02:04PM  
16 reaches out or if I need to send them an e-mail 02:05PM  
17 following up on something. 02:05PM

18 Q. Okay. And so it would mostly be e-mails. Do 02:05PM  
19 you also have phone calls? 02:05PM

20 A. Not often, unless there is clarity needed or 02:05PM  
21 unless they call me, they pick up the phone, maybe in 02:05PM  
22 regards to a technical assistance as far as the GrantApp 02:05PM  
23 or they're having trouble submitting something or 02:05PM  
24 something like that. 02:05PM

25 Q. What type of technical assistance would you 02:05PM

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1 provide, on what topics?

02:05PM

2 A. Grant application.

02:05PM

3 Q. Yes?

02:05PM

4 A. Or if they needed information on how to submit  
5 something. Mostly just programatic type of things.

02:05PM

02:05PM

6 Q. When you say "submit something," what are they  
7 submitting?

02:05PM

02:06PM

8 A. The logs, the social worker's logs. If they  
9 need to -- BASC -- the BASC, if they need something  
10 entered, a new staff member entered for the BASC, things  
11 like that.

02:06PM

02:06PM

02:06PM

02:06PM

12 Q. What is BASC?

02:06PM

13 A. It is one of the assessments that is used  
14 within the program, the BASC and the SDQ.

02:06PM

02:06PM

15 Q. What do they measure, these assessments?

02:06PM

16 A. The BASC is a measurement. It's behavioral --  
17 and it escapes me what the letter stands for, but it's  
18 though Pearson, and it's a behaviorial assessment.

02:06PM

02:06PM

02:06PM

19 Q. Okay. And then what about the SDQ?

02:06PM

20 A. The SDQ is a -- it's a skills questionnaire,  
21 and I'm trying to remember what the D in SDQ stands for,  
22 because that escapes me. But it's also an assessment  
23 that is used. And so if they need someone added to be  
24 an administrator for those, then I can add a person to  
25 adminis- -- that is the administrator for those.

02:06PM

02:07PM

02:07PM

02:07PM

02:07PM

02:07PM

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1 Q. Does GaDOE fund the regional GNETS programs  
2 participation in BASC and SDQ?

3 A. Yes.

4 Q. Are there other documents that they would be  
5 submitting that they would have technical assistance on,  
6 they being the regional GNETS programs?

7 A. They don't submit anything to us through SDQ  
8 and BASC, it's just -- it's just assessments that they  
9 can use for the students, but it's not -- it doesn't --  
10 it's not -- it's not like i-Ready --

11 Q. Okay.

12 A. -- or instructional.

13 Q. Okay.

14 A. I would say.

15 Q. Earlier you said that you would answer  
16 technical assistance questions --

17 A. Mm-hmm.

18 Q. -- regarding SDQ and BASC?

19 A. Not the assessment, just strictly how do I  
20 access the SDQ, how do I enter information into, but  
21 not -- I don't answer or provide technical assistance on  
22 how to provide the assessment itself.

23 Q. Got it. So am I correct that you answer  
24 technical questions related to the SDQ and BASC for the  
25 regional GNETS program directors?

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1 A. Yes.

02:08PM

2 Q. Yes?

02:08PM

3 A. Yes.

02:08PM

4 Q. Okay. Going back to the meetings with the  
5 regional GNETS directors --

02:08PM

02:08PM

6 A. Yes.

02:09PM

7 Q. -- that are largely monthly --

02:09PM

8 A. (Nodding yes.)

02:09PM

9 Q. -- what is the purpose of these meetings?

02:09PM

10 A. To provide updates regarding anything they

02:09PM

11 might need to be updated on, and also to provide

02:09PM

12 information from other divisions within the Department

02:09PM

13 of Education. For example, teacher -- and teachers --

02:09PM

14 TKES and LKES, which is the Teacher Keys, Leader Keys,

02:09PM

15 the evaluation system that the State uses.

02:09PM

16 So, somebody from that department might

02:09PM

17 come and do a presentation to the directors on how to

02:09PM

18 make sure all their teachers are in the platform, and

02:09PM

19 the evaluations are completed. Someone from Special

02:09PM

20 Education might come do a presentation on transition for

02:09PM

21 high school students. So just different people within

02:09PM

22 DOE that do presentations to the directors.

02:09PM

23 Q. And by DOE you meant --

02:09PM

24 A. Georgia Department of Ed.

02:10PM

25 Q. -- Georgia Department of Ed?

02:10PM

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1 A. Georgia Department -- GaDOE. 02:10PM

2 Q. Okay. You said you provide updates? 02:10PM

3 A. Mm-hmm. 02:10PM

4 Q. Updates on what? 02:10PM

5 A. Updates on changes that might be made to the 02:10PM  
6 schedule for our monthly meetings or updates on due 02:10PM  
7 dates for certain things or updates on webinars that are 02:10PM  
8 going to be provided, not by us but by other people 02:10PM  
9 outside on maybe special design instructions or things 02:10PM  
10 like that. So just to make sure that they're aware of 02:10PM  
11 those type of things that could be offered to them. 02:10PM

12 Q. Who sets the agenda for the monthly meetings? 02:10PM

13 A. Vickie usually, and myself. 02:10PM

14 Q. In consultation with you? 02:10PM

15 A. Mm-hmm. 02:10PM

16 Q. Are the agendas sent out in advance to the 02:10PM  
17 regional GNETS programs? 02:10PM

18 A. No. 02:10PM

19 Q. I am going to introduce an exhibit that has 02:10PM  
20 paper, but also there's going to be an electronic 02:10PM  
21 component. 02:11PM

22 A. Okay. 02:11PM

23 MS. TUCKER: I'd like the Court Reporter to 02:11PM  
24 mark this document as Plaintiff's Exhibit 429. 02:11PM

25 (Plaintiff's Exhibit 429 marked for 02:11PM



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1 identification.)

2 Q. BY MS. TUCKER: The Bates number on the bottom  
3 of this documents reads, GA00956689. This is a  
4 May 26th, 2020 e-mail from Vickie Cleveland to you. The  
5 subject of the e-mail reads: "Draft responses." And  
6 there is one attachment titled: "Copy of copy GNETS  
7 director meeting questions, 2020-05-26."

8 A. (Witness examining document.)

9 Q. Dr. Stevenson, do you recognize this e-mail?

10 A. Yes.

11 Q. Yes?

12 A. Yes.

13 Q. Okay. We're going to turn to the attachment  
14 which starts with GA00956690. But this is a  
15 spreadsheet, so my colleague Megan Erickson is going to  
16 share the screen and then you'll be able to access it.

17 THE VIDEOGRAPHER: And just let me know if  
18 there's any issue with the screen share.

19 MS. TUCKER: I think it's about to happen.

20 Q. BY MS. TUCKER: Great. And then do you have  
21 control over the document, Dr. Stevenson? I know you  
22 see it.

23 A. Yes, I do.

24 Q. Okay. So you are able to manipulate and zoom  
25 in and --

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1 A. Well, I can move the mouse. 02:12PM

2 Q. Okay. Are you able to zoom in? 02:12PM

3 THE VIDEOGRAPHER: Oh, you might have to 02:12PM

4 hit the plus sign or you can do this with your fingers 02:12PM

5 on the mouse pad. 02:13PM

6 THE WITNESS: Oh. 02:13PM

7 THE VIDEOGRAPHER: Do you want me to go off 02:13PM

8 the record? 02:13PM

9 MS. TUCKER: Yes, let's go off the record 02:13PM

10 just real quick. 02:13PM

11 THE VIDEOGRAPHER: All right. Off the 02:13PM

12 record at 2:14 p.m. 02:13PM

13 (Off the record at 2:14 p.m.) 02:13PM

14 THE VIDEOGRAPHER: Back on the record at 02:15PM

15 2:16 p.m. 02:15PM

16 Q. BY MS. TUCKER: Dr. Stevenson, are you now 02:15PM

17 looking at the spreadsheet that we identified as 02:15PM

18 GA0095690? 02:15PM

19 A. Yes. 02:15PM

20 Q. Okay. Do you recognize this spreadsheet? 02:15PM

21 A. Yes. 02:15PM

22 Q. Did you create it? 02:15PM

23 A. I created a form in Jotform -- 02:15PM

24 Q. Okay. 02:15PM

25 A. -- where the GNETS directors -- since we were 02:15PM

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1 going virtual.

02:15PM

2 Q. Okay.

02:15PM

3 A. This would give them an opportunity to have  
4 their questions answered ahead of time so we can make  
5 sure that they were addressed.

02:15PM

02:15PM

02:15PM

6 Q. Okay. What is Jotform?

02:15PM

7 A. Jotform is a platform you can use to create  
8 documents and send out to people for various things, so  
9 I just used that to create this. And then after -- and  
10 then it will automatically put it on Excel, if you  
11 request it.

02:16PM

02:16PM

02:16PM

02:16PM

02:16PM

12 Q. Got it. And is this a form that you created  
13 that then the regional GNETS directors could add to it?

02:16PM

02:16PM

14 A. Well, I would -- the Jotform would just say,  
15 "Questions for monthly directors meeting," and then I  
16 would send the link out.

02:16PM

02:16PM

02:16PM

17 Q. Okay.

02:16PM

18 A. And then they would put whatever questions they  
19 would have for the upcoming meeting, that they might  
20 need answered, so we could make sure that they were  
21 addressed.

02:16PM

02:16PM

02:16PM

02:16PM

22 Q. And is this practice of answering questions  
23 in -- having questions to answer in advance, is that  
24 standard practice for your GNETS meetings with the  
25 regional directors?

02:16PM

02:16PM

02:16PM

02:16PM

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1 A. It's wasn't -- it's not necessarily standard  
2 practice, but in other departments within GaDOE we've  
3 seen that and how it ensured that everybody's questions  
4 got answered, so we thought it would be a good practice  
5 to try to start using.

6 Q. Are you currently using this practice?

7 A. We -- we've only had one meeting, two meetings,  
8 this year and I haven't done a Jotform for the meeting  
9 so far this year.

10 Q. Have regional GNETS directors reached out with  
11 questions in advance of the monthly meetings separate  
12 from the Jotform?

13 A. Sometimes they'll have questions just in  
14 general, but there might be questions that we're going  
15 to address at the meeting.

16 Q. So am I correct, looking at this spreadsheet,  
17 there's text and black font?

18 A. Mm-hmm.

19 Q. Those are the questions that you put in, that  
20 you received from the regional GNETS directors?

21 A. Those are the questions that they put in  
22 themselves.

23 Q. Okay.

24 A. So I didn't put in any questions. I just sent  
25 a link and they had to select, you know, question, and

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1 then what their question was in regards to, and then  
2 they put their questions in there.

3 Q. Did they also identify the topic or did you  
4 identify --

5 A. They had options to choose from for the topic.

6 Q. Okay. And now I see answers in red, red front?

7 A. Yes.

8 Q. Who wrote the red font?

9 A. Vickie.

10 Q. Vickie. Okay. And are these red font answers  
11 something that you would share in advance of the meeting  
12 or is this something that you would discuss at the  
13 meeting?

14 A. These would be the answers Vickie would give  
15 them at the meeting.

16 Q. Verbally?

17 A. Yes.

18 Q. Did Vickie ask you to create a spreadsheet like  
19 this through Jotform?

20 A. No. Like I said, we just thought it would be a  
21 good idea to make sure questions were being addressed.

22 Q. The last two meetings that you've had this  
23 school year, you think one or two?

24 A. Mm-hmm.

25 Q. Did any regional GNETS directors send you

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1 questions in advance?

02:19PM

2 A. No. But some reached out and had questions  
3 about, you know, things that might have been answered at  
4 the meeting, but they didn't necessarily send questions  
5 specific to the meeting.

02:19PM

02:19PM

02:19PM

02:19PM

6 Q. Do regional GNETS directors have an opportunity  
7 to ask questions at the meeting as well?

02:19PM

02:19PM

8 A. Yes, they do. Even if they had filled out the  
9 form, they still could ask a question.

02:19PM

02:19PM

10 Q. So there's generally a question/answer  
11 portion --

02:19PM

02:19PM

12 A. Yes.

02:19PM

13 Q. -- during the meeting?

02:19PM

14 A. Yes.

02:19PM

15 Q. Okay. Is the information in a spreadsheet like  
16 this one ever shared, then, via e-mail to --

02:19PM

02:19PM

17 A. No.

02:19PM

18 Q. -- to the GNETS regional directors?

02:19PM

19 A. No.

02:19PM

20 Q. What else is discussed at these meetings?

02:19PM

21 A. That's it.

02:19PM

22 Q. Is academic progress discussed?

02:19PM

23 A. No.

02:20PM

24 Q. Are therapeutic supports and services  
25 discussed?

02:20PM

02:20PM

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1 A. No. Unless someone is doing a presentation on  
2 them.

3 Q. Have you had presentations on that?

4 A. If someone did a TIC presentation -- I'm  
5 sorry -- Trauma-Informed Care, presentation or -- that's  
6 the only one I can think of off the top of my head, but  
7 if there was a person that did a presentation, then it  
8 would be discussed within that presentation.

9 Q. Is it -- is exiting the GNETS program discussed  
10 during the regional GNETS program meetings with the  
11 directors?

12 A. No.

13 Q. How about the time and program?

14 A. No.

15 Q. How about how to make referrals to GNETS?

16 A. No.

17 Q. How about post secondary outcomes?

18 A. No.

19 Q. Do you track post secondary outcomes for GNETS  
20 students?

21 A. I do not.

22 Q. Does GaDOE track post secondary outcomes for  
23 GNETS students?

24 A. I'm not sure if they track them specifically,  
25 but I know post secondary outcomes are tracked for

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1	students.	02:21PM
2	Q. Does the GNETS program through GaDOE track	02:21PM
3	referrals to GNETS programs?	02:21PM
4	A. No.	02:21PM
5	Q. Does GaDOE put forth common guidance on how	02:21PM
6	GNETS referrals should be made across the program?	02:21PM
7	MS. JOHNSON: Objection.	02:21PM
8	THE WITNESS: GaDOE -- can you repeat that?	02:21PM
9	Q. BY MS. TUCKER: Yeah. I was curious if GaDOE	02:21PM
10	put forth guidance documents on how referrals should	02:21PM
11	look into the GNETS program.	02:21PM
12	A. GaDOE specifically does not.	02:21PM
13	Q. Who does?	02:21PM
14	MS. JOHNSON: Objection.	02:22PM
15	Q. BY MS. TUCKER: Does anyone?	02:22PM
16	A. What documents are you referring to?	02:22PM
17	Q. GNETS referral form document.	02:22PM
18	A. No. I don't know of GaDOE having any referral	02:22PM
19	forms.	02:22PM
20	Q. Okay. Or consultation form?	02:22PM
21	A. Created by someone at GaDOE?	02:22PM
22	Q. Yes.	02:22PM
23	A. I'm -- I'm not sure.	02:22PM
24	Q. How about disseminated by someone at GaDOE?	02:22PM
25	A. What forms?	02:22PM



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1	Q. A consultation form?	02:22PM
2	A. Disseminated to whom?	02:22PM
3	Q. The GNETS directors or the LEAs?	02:22PM
4	A. There are forms that -- do you have an example	02:22PM
5	of a form?	02:22PM
6	Q. I can come back with one.	02:22PM
7	A. Yeah.	02:22PM
8	Q. Okay. Let me just make a note of that.	02:22PM
9	A. Okay.	02:23PM
10	Q. Happy to do that. With time and program --	02:23PM
11	A. Mm-hmm.	02:23PM
12	Q. -- I know you said it wasn't discussed at the	02:23PM
13	meetings. Is it tracked by GaDOE?	02:23PM
14	A. No. Not to my knowledge.	02:23PM
15	Q. Earlier you referenced that you provided a	02:23PM
16	GNETS overview training to the regional GNETS directors;	02:23PM
17	is that correct?	02:23PM
18	A. A GNETS overview?	02:23PM
19	Q. Yes.	02:23PM
20	A. Not to the GNETS directors. They don't need an	02:23PM
21	overview.	02:23PM
22	Q. To other audiences?	02:23PM
23	A. Yes.	02:23PM
24	Q. So what trainings have you provided to the	02:23PM
25	regional GNETS program directors?	02:23PM

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1 A. Strategic planning grant application. 02:23PM

2 Q. Okay. 02:23PM

3 A. I-Ready. 02:23PM

4 Q. And the rule? 02:23PM

5 A. They -- 02:23PM

6 Q. No, the GNETS rule as well? 02:23PM

7 A. I'm not sure if I provided training for them 02:23PM  
8 specifically on the rule; maybe Vickie has. 02:23PM

9 Q. On the strategic plan, the grants, and i-Ready, 02:23PM  
10 is this an annual-type training? 02:24PM

11 A. No. 02:24PM

12 Q. Okay. Are the trainings that you've provided, 02:24PM  
13 have they been in conjunction with a monthly meeting or 02:24PM  
14 are they separate? 02:24PM

15 A. Most of the time they're in conjunction with a 02:24PM  
16 monthly meeting. 02:24PM

17 Q. Okay. 02:24PM

18 A. I think when I did the grant application 02:24PM  
19 portal, when that was separate -- because that took up a 02:24PM  
20 lot of time going through each section. And the 02:24PM  
21 strategic plan reviews, with new directors, are done one 02:24PM  
22 on one. 02:24PM

23 Q. Okay. You said that they're other folks in 02:24PM  
24 GaDOE, who sometimes come in to train during these 02:24PM  
25 meetings; correct? 02:24PM

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1 A. Mm-hmm.

02:24PM

2 Q. Or present. What offices in GaDOE have done  
3 that?

02:24PM

02:24PM

4 A. It's been various offices. It could have been  
5 Special Education, like I said, Transition,  
6 Results-Driven Accountability, GO-IEP. Those are just  
7 some but we've had numerous people present to the  
8 directors.

02:25PM

02:25PM

02:25PM

02:25PM

02:25PM

9 Q. What component of GaDOE has presented on  
10 transition?

02:25PM

02:25PM

11 A. Within the -- I'm not sure if she's an RDA, but  
12 she's within Special Education, and she is the program  
13 specialist for Transition, for the State.

02:25PM

02:25PM

02:25PM

14 Q. And I want to make sure we have the same  
15 understanding of transition. So when you speak of  
16 transition here --

02:25PM

02:25PM

02:25PM

17 A. Transition -- when we're speaking of transition  
18 from the State, what she does perspective, the  
19 transition specialist, there's certain elements of  
20 transition that has to be addressed within the IEP. So  
21 she trains on those and the resources that are available  
22 for all students with disabilities for transition,  
23 post -- to post secondary outcomes.

02:25PM

02:25PM

02:25PM

02:25PM

02:25PM

02:25PM

02:26PM

24 Q. So transition to post secondary outcomes?

02:26PM

25 A. Mm-hmm. Planning for transition for high

02:26PM

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1 school students and what they're going to do after high  
2 school.

3 Q. I understand. Has there been trainings on  
4 transitioning out of GNETS, not out of -- you know, not  
5 out to post secondary but to -- back to a home school?

6 A. Training for the GNETS directors?

7 Q. Mm-hmm.

8 A. What type of, like, what -- I'm going to say I  
9 don't know because I don't know what that looks like.

10 Q. I was curious if there was training to the  
11 GNETS directors that provided information on what steps  
12 to take when a student is ready to transition back to  
13 their home school?

14 A. That would be within the LEA. The LEA special  
15 Ed director and the GNETS director.

16 Q. And does GaDOE provide --

17 A. No.

18 Q. -- guidance on that?

19 A. No.

20 Q. Okay. I am going to give you another document.

21 MS. TUCKER: I'd like the Court Reporter to  
22 mark this as 430.

23 (Plaintiff's Exhibit 430 marked for  
24 identification.)

25 Q. BY MS. TUCKER: The Bates number on the bottom

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1 of this document reads GA00942899. This is a 02:27PM  
2 January 14th, 2019 meeting invite from you to Vickie 02:27PM  
3 Cleveland, Joanna Mock, LaChrista McQueen, Kerrie 02:27PM  
4 Miller, Brook Cole, and Whitney Braddock. The subject 02:27PM  
5 reads: "Go to meeting invitation, GNETS executive 02:28PM  
6 board." 02:28PM

7 A. (Witness examining document.) 02:28PM

8 Q. Dr. Stevenson, do you recognize this e-mail? 02:28PM

9 A. I do, yes. 02:28PM

10 Q. Okay. Am I correct that the invitees, other 02:28PM  
11 than yourself and Vickie Cleveland, are regional GNETS 02:28PM  
12 directors? 02:28PM

13 A. Yes. 02:28PM

14 Q. Dr. Stevenson, what is the GNETS executive 02:28PM  
15 board? 02:28PM

16 A. They were a group that was in place prior to me 02:28PM  
17 becoming a program specialist that would meet with the 02:28PM  
18 person that was working with GNETS at the State, prior 02:28PM  
19 to any GNETS director monthly meetings to review topics 02:28PM  
20 that the directors felt were important to address and to 02:28PM  
21 help develop the agenda. 02:28PM

22 Q. Okay. You said "were." Does the GNETS 02:28PM  
23 executive board no longer exist? 02:29PM

24 A. We asked if they wanted to continue and no one 02:29PM  
25 stepped up to say they did. 02:29PM

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1 Q. When did --

02:29PM

2 A. It was up to them to decide if that's what they  
3 wanted to do.

02:29PM

02:29PM

4 Q. When did it disband?

02:29PM

5 A. Probably around COVID.

02:29PM

6 Q. Okay. Has there been discussions about it  
7 reinitiating?

02:29PM

02:29PM

8 A. Not to my knowledge.

02:29PM

9 Q. What was your role during the GNETS executive  
10 board meetings?

02:29PM

02:29PM

11 A. Just to listen and discuss with the directors  
12 any questions or concerns that they might want to bring  
13 up or, you know, that their colleagues might have wanted  
14 to address.

02:29PM

02:29PM

02:29PM

02:29PM

15 Q. Okay. So it sounds like these meetings were  
16 held in advance of the monthly meetings --

02:29PM

02:29PM

17 A. Yes.

02:30PM

18 Q. -- with everyone?

02:30PM

19 A. Yes.

02:30PM

20 Q. Okay. Earlier we spoke about you visiting  
21 regional GNETS programs?

02:30PM

02:30PM

22 A. Mm-hmm.

02:30PM

23 Q. Yes?

02:30PM

24 A. Yes.

02:30PM

25 Q. Of the 24, have you given more thought to how

02:30PM

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1 many you've visited?

02:30PM

2 A. I would probably -- if I had to guess, because

02:30PM

3 I'm not going to say this is an accurate assessment --

02:30PM

4 Q. I understand.

02:30PM

5 A. -- about 20.

02:30PM

6 Q. Okay. So a large majority?

02:30PM

7 A. Yes.

02:30PM

8 Q. And we spoke about you visiting as part of a

02:30PM

9 walkthrough of the strategic plan?

02:30PM

10 A. Mm-hmm.

02:31PM

11 Q. Have you thought -- and you said you wanted to

02:31PM

12 continue thinking. What other reasons would you

02:31PM

13 visit -- or have you visited, excuse me, a regional

02:31PM

14 GNETS program?

02:31PM

15 A. At the request of a special Ed's director or

02:31PM

16 GNETS director.

02:31PM

17 Q. Okay. During your time visiting the regional

02:31PM

18 GNETS programs, I'm assuming the meetings are varied?

02:31PM

19 A. And a lot of times they're not even meetings,

02:31PM

20 they're just us walking through to see the program, and

02:31PM

21 that's about it. It's not necessarily us meeting and

02:31PM

22 sitting down and talking about anything.

02:31PM

23 Q. You communicate when you're walking around?

02:31PM

24 A. Right.

02:31PM

25 Q. Okay. Do you meet with the GNETS directors in

02:31PM

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1 their space at the regional GNETS programs? 02:31PM

2 A. Sometimes. 02:31PM

3 Q. Do you meet with GNETS teachers? 02:31PM

4 A. No. 02:31PM

5 Q. Never? 02:31PM

6 A. No. 02:31PM

7 Q. Do you meet with other GNETS staff? 02:31PM

8 A. No. Unless it's a coordinator. And it 02:31PM

9 wouldn't be a meeting. Like, maybe the director, for 02:31PM

10 example, wasn't there one day so the coordinator walked 02:32PM

11 us around. 02:32PM

12 Q. By "coordinator," do you mean GNETS site 02:32PM

13 coordinator? 02:32PM

14 A. Yes. 02:32PM

15 Q. Okay. During any visits to a regional GNETS 02:32PM

16 program, have you observed classroom instruction? 02:32PM

17 A. Sometimes, but not in a I-have-a-pen-and-paper 02:32PM

18 based on the Georgia standards of excellence type of 02:32PM

19 observation, no. Not a formal observation. 02:32PM

20 Q. Do you review facility conditions? 02:32PM

21 A. Not with a formal type of facility checklist, 02:32PM

22 no. 02:32PM

23 Q. When you are walking around, do you make note 02:32PM

24 of facility conditions? 02:32PM

25 A. If something stands out. 02:32PM



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1	Q. Have you seen anything stand out?	02:32PM
2	A. Not that I can recall at this time.	02:32PM
3	Q. Do you observe therapeutic supports when you're	02:32PM
4	onsite?	02:33PM
5	A. If -- if it's happening at that time, yeah.	02:33PM
6	Q. Do you make note of the usage and whether it's	02:33PM
7	being applied properly given your background?	02:33PM
8	MS. JOHNSON: Objection.	02:33PM
9	THE WITNESS: I would say no, because often	02:33PM
10	times you have to have more context than the two or	02:33PM
11	three minutes that you see something.	02:33PM
12	Q. BY MS. TUCKER: Do you meet with students on	02:33PM
13	these visits?	02:33PM
14	A. No.	02:33PM
15	Q. Have you met with students or their families	02:33PM
16	from the GNETS program?	02:33PM
17	A. No.	02:33PM
18	Q. Do you receive calls or letters from parents	02:33PM
19	regarding their student's placement in the GNETS	02:33PM
20	program?	02:33PM
21	A. Occasionally I'll get an e-mail from a parent	02:33PM
22	who e-mails everybody who works at the State Department	02:34PM
23	about something.	02:34PM
24	Q. About some parent speaking about GNETS?	02:34PM
25	A. Yes.	02:34PM

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1 Q. What have those e-mails entailed? 02:34PM

2 A. It varies. I mean, it just depends. I don't 02:34PM  
3 know. 02:34PM

4 Q. Can you give me an example of one you've 02:34PM  
5 received? 02:34PM

6 A. A parent who had concerns about the bus. 02:34PM

7 Q. What type of concerns on the bus? 02:34PM

8 A. I don't remember specifically, because they 02:34PM  
9 didn't really get into the specifics. It was just, 02:34PM  
10 like, I have concerns; my child is a GNETS student, with 02:34PM  
11 their bus, someone needs to call me. 02:34PM

12 Q. Who takes that next step? 02:34PM

13 A. So usually I send it to Vickie and then Vickie 02:34PM  
14 decides what to do with it. 02:34PM

15 Q. Have you had to call parents in response to 02:34PM  
16 correspondence? 02:35PM

17 A. No. 02:35PM

18 Q. Do you review any complaints received by the 02:35PM  
19 regional GNETS programs? 02:35PM

20 A. No. 02:35PM

21 Q. While you are onsite, do you confirm enrollment 02:35PM  
22 at the regional GNETS programs? 02:35PM

23 A. No. 02:35PM

24 Q. Do you check to see if students are in 02:35PM  
25 attendance? 02:35PM

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1 A. No.

02:35PM

2 Q. Do you check to see whether there are seclusion  
3 rooms?

02:35PM

02:35PM

4 A. That's not a part of, like, a list or something  
5 that we go do, no.

02:35PM

02:35PM

6 Q. Have you noticed seclusion rooms during any of  
7 your visits?

02:35PM

02:35PM

8 A. I have not, that I can recall.

02:35PM

9 Q. Do you observe whether students are being  
10 restrained?

02:35PM

02:35PM

11 A. I have not seen that during a visit that I've  
12 been on.

02:35PM

02:35PM

13 Q. After you visit, do you advise the regional  
14 GNETS program director of recommendations?

02:35PM

02:36PM

15 MS. JOHNSON: Objection.

02:36PM

16 THE WITNESS: I have not.

02:36PM

17 Q. BY MS. TUCKER: Have you advised a regional  
18 GNETS director of feedback?

02:36PM

02:36PM

19 A. I have not.

02:36PM

20 Q. Do you take note if the GNETS centers have  
21 playgrounds?

02:36PM

02:36PM

22 A. I have not.

02:36PM

23 Q. Do you take note if they have music rooms?

02:36PM

24 A. I have not.

02:36PM

25 Q. Art rooms?

02:36PM

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1	A. I have not.	02:36PM
2	Q. Science labs?	02:36PM
3	A. I have not.	02:36PM
4	Q. Why not?	02:36PM
5	A. It's just a walkthrough, it's not an official	02:36PM
6	checklist to look for anything specific. It's just	02:36PM
7	let's go, I'm new, let's go see what the program looks	02:36PM
8	like.	02:36PM
9	Q. Given your background in education, do you	02:36PM
10	think having access to playgrounds, music rooms, art	02:36PM
11	rooms, and science labs is important for student	02:36PM
12	education?	02:37PM
13	MS. JOHNSON: Objection.	02:37PM
14	THE WITNESS: I don't know. I'd have to	02:37PM
15	think about it.	02:37PM
16	Q. BY MS. TUCKER: I'm happy to give you a minute	02:37PM
17	to think about it.	02:37PM
18	A. Can we come back?	02:37PM
19	Q. Yep. Let me write that down.	02:37PM
20	At school-based locations, do you make note	02:37PM
21	of where the GNETS classrooms are located?	02:37PM
22	A. No.	02:37PM
23	Q. Have you seen GNETS classrooms located in	02:37PM
24	separate wings or basements of schools?	02:37PM
25	MS. JOHNSON: Objection.	02:37PM

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1 THE WITNESS: I've seen -- I have not seen 02:37PM  
2 GNETS program located in basements. I have not seen 02:37PM  
3 GNETS programs necessarily located on separate wings 02:37PM  
4 from other students. There will be other classrooms on 02:37PM  
5 the hall too. 02:37PM

6 Q. BY MS. TUCKER: Have you seen GNETS programs 02:37PM  
7 that have portables? 02:37PM

8 A. If -- I've not -- I've not been to a program 02:38PM  
9 where a GNETS had a portable. 02:38PM

10 Q. Okay. So earlier we spoke about i-Ready. 02:38PM

11 A. Yes. 02:38PM

12 Q. Earlier you said you wanted to think more about 02:38PM  
13 if you would reach out, if there was stagnant growth. 02:38PM

14 A. Mm-hmm. 02:38PM

15 Q. I wanted to give you an opportunity to revisit 02:38PM  
16 that. 02:38PM

17 A. Yes. So a part of -- and I'm glad I had time 02:38PM  
18 to think about that. A part of our contract with 02:38PM  
19 i-Ready is the person who's assigned to i-Ready for 02:38PM  
20 GNETS, from the company itself, they actually reach out 02:38PM  
21 to the GNETS directors and send them reports and discuss 02:38PM  
22 their reports with them. 02:38PM

23 Q. And you do that as well if there was -- 02:38PM

24 A. No. I don't do that. 02:38PM

25 Q. Am I correct that earlier you said you'd reach 02:38PM

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1 out if there was negative growth?

02:38PM

2 A. I did. I did say that.

02:38PM

3 Q. Okay.

02:38PM

4 A. So --

02:38PM

5 Q. Do you --

02:38PM

6 A. I misspoke.

02:38PM

7 Q. You misspoke?

02:38PM

8 A. (Nodding yes.)

02:39PM

9 Q. So just to make sure I understand, you receive  
10 the data as the i-Ready reports, monthly?

02:39PM

11 A. The data is in the program itself, in which I  
12 have access to, but the same data that I have access to  
13 the GNETS directors and the teachers have access to, so  
14 they're able to see the same information that I'm able  
15 to see.

02:39PM

02:39PM

02:39PM

02:39PM

02:39PM

16 Q. Okay.

02:39PM

17 A. So what I do is just call them to make note to  
18 say, hey, are you reviewing your i-Ready reports, and  
19 that's basically the extent of it.

02:39PM

02:39PM

02:39PM

20 Q. And why do you do that?

02:39PM

21 A. Because it's something that is in my job duties  
22 and responsibilities.

02:39PM

02:39PM

23 Q. So your job duty and responsibility is to  
24 confirm that they look at their data?

02:39PM

02:39PM

25 A. Just to monitor to check-in to see if they're

02:39PM

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1 checking their data, and that's the extent of it. 02:39PM

2 Q. So with monitoring data, you're saying you're 02:39PM  
3 monitoring as in you're looking to see that it exists? 02:39PM

4 A. Monitoring as in looking at the reports and at 02:40PM  
5 the end of the year there's a summary report that we 02:40PM  
6 look at and I discuss with Vickie. That's the 02:40PM  
7 monitoring. 02:40PM

8 Q. And what would you discuss at the end of the 02:40PM  
9 year? 02:40PM

10 A. We look at the overall percentage for the 02:40PM  
11 program as a whole, and the time spent within the 02:40PM  
12 program. And also, when looking at the data, if a 02:40PM  
13 student doesn't meet the weekly required time, that data 02:40PM  
14 is not considered sufficient for growth. 02:40PM

15 Q. Okay. 02:40PM

16 A. So if there is not a certain number of time 02:40PM  
17 spent in the program, then it's not reflecting accurate 02:40PM  
18 data. So, it all depends on if the program is using it 02:40PM  
19 the way it should be used as far as making sure the 02:40PM  
20 students are on the program certain amount of time. 02:40PM

21 Q. Does GaDOE determine whether they're going to 02:41PM  
22 continue funding a regional GNETS program, i-Ready 02:41PM  
23 usage, based on the -- based on their usage? 02:41PM

24 MS. JOHNSON: Objection. 02:41PM

25 THE WITNESS: It is offered to all 02:41PM

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1 programs, but all programs -- if there was another  
2 supplemental program they wanted to use in place of  
3 i-Ready, they'd have to do that as well.

4 Q. BY MS. TUCKER: Of the 24 programs, are all  
5 participating in i-Ready?

6 A. Yes, but we do not pay for all. One program,  
7 the -- their LEA is paying for it.

8 Q. For one of the 24 programs?

9 A. Yes.

10 Q. Which program?

11 A. Sabanich Adam (phonetic), because the whole  
12 district uses it, so...

13 Q. And the i-Ready data, is it on an individual  
14 basis or an aggregate level?

15 A. The one I look at is only on a program level.

16 Q. Okay.

17 A. Not on a student level.

18 Q. Is there any other monitoring of student  
19 academic progression by GaDOE?

20 A. No.

21 Q. Do you monitor any student dropout rates?

22 A. I do not.

23 Q. Does GaDOE monitor any student dropout rates  
24 for GNETS students?

25 A. GaDOE monitors student dropout rates in



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1 general.

02:42PM

2 Q. Do you and Vickie receive information, like,  
3 called out for the GNETS students?

02:42PM

02:42PM

4 A. I don't know if they have that disseminated or  
5 broken up by GNETS specifics for dropouts.

02:42PM

02:42PM

6 Q. Okay. I'm going to give you another one that  
7 has an electronic component.

02:43PM

02:43PM

8 A. Okay.

02:43PM

9 MS. TUCKER: I'm handing the Court Reporter  
10 what I would like marked as Plaintiff's Exhibit 431.

02:43PM

02:43PM

11 (Plaintiff's Exhibit 431 marked for  
12 identification.)

02:43PM

02:43PM

13 Q. BY MS. TUCKER: This is a September 4th, 2019  
14 e-mail from you to the regional GNETS program directors,  
15 and Vickie Cleveland is copied. The Bates number on the  
16 first page of this exhibit reads GA00951657. The  
17 subject reads: "Social worker logs." And there's one  
18 attachment.

02:43PM

02:43PM

02:43PM

02:43PM

02:43PM

02:44PM

19 A. (Witness examining document.)

02:44PM

20 Q. Dr. Stevenson, do you recognize this e-mail?

02:44PM

21 A. Yes.

02:44PM

22 Q. Okay. And am I correct that you write that  
23 GaDOE requires monthly logs detailing the therapeutic  
24 services provided by social workers?

02:44PM

02:44PM

02:44PM

25 A. Mm-hmm. Yes.

02:44PM

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1 Q. Is this to all regional GNETS program  
2 directors?

3 A. 11.

4 Q. 11. And these are the 11 that receive the  
5 grant?

6 A. The therapeutic grant.

7 Q. Okay. We just -- we'll be good without talking  
8 over one another.

9 What do you do with the information once  
10 you receive it?

11 A. I log that it has been submitted and then at  
12 the end of the year I do a summary.

13 Q. Okay. And that's the summary we looked at  
14 earlier?

15 A. Yes.

16 Q. Is this still current practice?

17 A. Yes.

18 Q. Okay. I want you to look at the spreadsheet,  
19 which was produced in its native format so my colleague  
20 will show it through Zoom. Let me know when you can see  
21 it, Dr. Stevenson.

22 A. I can see it.

23 Q. Okay. Dr. Stevenson, did you create this  
24 spreadsheet?

25 A. I'm not sure if I created it or not, or if it

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1 was something that was already in place, or if the GNETS  
2 director created it. I don't remember.

3 Q. Do you recognize this spreadsheet?

4 A. Yes, I do, though.

5 Q. Is this the same spreadsheet that you're using  
6 today?

7 A. It is but some of the directors change it up a  
8 little bit. But as long as it has the basic  
9 information, it can be changed.

10 Q. Okay. Am I correct that this is completed on  
11 the student level?

12 A. They -- they fill it out for whatever students  
13 they saw that month.

14 Q. Okay. Do all GNETS students receive  
15 therapeutic interventions?

16 A. Are we talking about through the social worker  
17 grant? What -- what are you talking about?

18 Q. I'm talking about general now.

19 A. Each program decides that.

20 Q. GNETS is a therapeutic program, right?

21 A. It is. And each program is responsible for  
22 implementing their therapeutic support.

23 Q. Okay.

24 A. Each program is different.

25 Q. Why would students be placed in GNETS for a

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1 therapeutic program if they're not then receiving  
2 therapeutic interventions?

3 MS. JOHNSON: Objection.

4 THE WITNESS: I don't know how to answer  
5 that.

6 Q. BY MS. TUCKER: What is an example of a  
7 therapeutic intervention?

8 A. Cognitive behavioral therapy.

9 Q. And what's that?

10 A. Cognitive behavioral therapy is where you  
11 provide -- I kind of call it like retraining your brain.

12 Q. Okay.

13 A. So for example -- is that good? Do you want an  
14 example?

15 Q. No. I would like the example.

16 A. For example, if someone has -- and I'm going to  
17 put it in a little bit different terms.

18 Q. Mm-hmm.

19 A. So if someone has insomnia, and they go to  
20 receive cognitive behavioral therapy for that insomnia,  
21 basically, retraining your brain on how to sleep or how  
22 to get the right amount of sleep. So through the  
23 process of documenting the time you go to sleep, how  
24 many times you wake up in the day, and then adjusting  
25 that based on your needs.

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1 So, for example, if a student was having a 02:47PM  
2 hard time staying still, okay, what is his baseline, he 02:47PM  
3 can sit in his seat for five minutes. We want him to 02:47PM  
4 sit in his seat for seven minutes. What are we going to 02:47PM  
5 do? What interventions to put in place? And then once 02:47PM  
6 they reach their target, then you continue to extend it 02:48PM  
7 until they're able to sit in their seat for an extended 02:48PM  
8 amount of time. 02:48PM

9 Q. Thank you for that example. 02:48PM

10 A. Mm-hmm. 02:48PM

11 Q. I'm going to give you another one. 02:48PM

12 MS. TUCKER: I'd like the Court Reporter to 02:48PM  
13 mark the following as Plaintiff's Exhibit 432. 02:48PM

14 (Plaintiff's Exhibit 432 marked for 02:48PM  
15 identification.) 02:48PM

16 Q. BY MS. TUCKER: The Bates number on the first 02:48PM  
17 page of this document is GA00956503. I'll wait until 02:48PM  
18 you get it. 02:49PM

19 A. (Witness examining the document.) 02:49PM

20 Q. I'll read the Bates number again for you. 02:49PM

21 A. I got it. 02:49PM

22 Q. You got it. Okay. This is an e-mail thread 02:49PM  
23 from May 14th, 2020, with the most recent e-mail from 02:49PM  
24 you to Vickie Cleveland, and the subject is: "Question 02:49PM  
25 from Helen." And there is one attachment. 02:49PM

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1	A. (Witness examining document.)	02:49PM
2	Q. Dr. Stevenson, do you recognize this e-mail?	02:49PM
3	A. Yes.	02:49PM
4	Q. I'm sorry?	02:49PM
5	A. Yes.	02:49PM
6	Q. Let's go down to the first e-mail in the	02:49PM
7	thread, which appears on Page GA00956504. It's an	02:49PM
8	e-mail from Shawn Owen to Zelfhine Smith-Dixon and	02:49PM
9	Vickie Cleveland. Do you see where Shaun Owen writes:	02:49PM
10	"Helen Rice asked in the Board meeting how we are	02:49PM
11	overseeing the GNETS funds and seemed to think we were	02:50PM
12	not able to provide therapeutic support. I am not sure	02:50PM
13	why she thinks therapeutic supports is not provided	02:50PM
14	through GNETS." Do you see that?	02:50PM
15	A. I do.	02:50PM
16	Q. Okay. Who is Helen Rice?	02:50PM
17	A. I have no idea.	02:50PM
18	Q. Okay. And by "Board," does Shaun Owen mean the	02:50PM
19	State Board of Education?	02:50PM
20	A. I would assume.	02:50PM
21	Q. Okay. Do you see that Shaun Owen continues:	02:50PM
22	"I would like to provide additional information so she	02:50PM
23	understands the therapeutic services and how we monitor	02:50PM
24	funding and support GNETS." Do you see that?	02:50PM
25	A. Yes.	02:50PM

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1 Q. How does GaDOE monitor funding and support  
2 GNETS?

3 MS. JOHNSON: Objection.

4 THE WITNESS: I don't do anything with the  
5 budget.

6 Q. BY MS. TUCKER: How does GaDOE support GNETS?

7 MS. JOHNSON: Objection.

8 THE WITNESS: We provide monthly meetings,  
9 updates, trainings.

10 Q. BY MS. TUCKER: Let's work our way through the  
11 thread. Next, it looks like Vickie Cleveland forwards  
12 this e-mail to you. Do you see that on the May 14th at  
13 12:04 p.m.?

14 A. Yes.

15 Q. Okay. Do you see where Vickie writes: "Can  
16 you pull the therapeutic services flyer that we  
17 developed last year. Can you also create the flyer to  
18 reflect services provided thus far this school year."  
19 Do you see that?

20 A. Yes.

21 Q. Okay. And then moving up to your next e-mail,  
22 do you see where you said: "I found the flyer for the  
23 SW, but I can't find the other one. Are you talking  
24 about the one used to present to Mr. Winter?" Do you  
25 see that?

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1	A. Mm-hmm. Yes.	02:52PM
2	Q. What does SW refer to?	02:52PM
3	A. Social worker.	02:52PM
4	Q. Okay. And you, in that sentence you say, "I	02:52PM
5	can't find the other one." What does "other one" refer	02:52PM
6	to?	02:52PM
7	A. I'm not sure. I'm actually trying to think	02:52PM
8	about that.	02:52PM
9	Q. Okay. Who is Mr. Winter?	02:52PM
10	A. He was on the Board of Education.	02:52PM
11	Q. You said was?	02:52PM
12	A. I don't think he is anymore.	02:52PM
13	Q. Okay. What was presented to Mr. Winter?	02:52PM
14	A. The social worker's flyer. The flyer that we	02:52PM
15	looked at earlier.	02:52PM
16	Q. Okay. It was one of the earlier exhibits?	02:52PM
17	A. Yes.	02:52PM
18	Q. Let's confirm.	02:52PM
19	A. Let me see.	02:52PM
20	Q. Is it -- was it exhibit -- was it in already	02:53PM
21	introduced 380?	02:53PM
22	A. Yes.	02:53PM
23	Q. Okay.	02:53PM
24	A. That was an example, Mm-hmm.	02:53PM
25	Q. Okay. So just to confirm, the flyer that you	02:53PM



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1 presented to Mr. Winter was the already introduced  
2 Plaintiff's Exhibit 380?

3 A. It might not have been that one specifically,  
4 but that's what it would look like.

5 Q. A flyer like that?

6 A. Yeah.

7 Q. Were you at this meeting with Mr. Winter?

8 A. No.

9 Q. Did you assist in preparation for the meeting  
10 with Mr. Winter?

11 A. I did the flyer. That's about it.

12 Q. Do you know who attended the meeting with  
13 Mr. Winter?

14 A. I don't.

15 Q. Vickie?

16 A. I don't know.

17 Q. Have you met with any State Board of Education  
18 members?

19 A. I have not.

20 Q. Okay. Moving up, you shared a document with  
21 Vickie Cleveland and asked her if it's the correct one,  
22 and she said yes, correct?

23 A. (Witness examining document.)

24 Q. So let's actually look. We have the  
25 attachment, and Megan can pull it up.

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1	A. Okay.	02:54PM
2	Q. Dr. Stevenson, do you see this document?	02:54PM
3	A. I do.	02:54PM
4	Q. Okay. Am I correct that this document reads	02:54PM
5	"LCSW summary for GNETS" at the top?	02:54PM
6	A. Yes.	02:54PM
7	Q. And does that mean licensed social worker	02:54PM
8	summary?	02:54PM
9	A. License clinical social worker.	02:55PM
10	Q. Thank you for the clarification.	02:55PM
11	And this -- looking -- I want you to take	02:55PM
12	an opportunity to look through it.	02:55PM
13	A. (Witness complying.)	02:55PM
14	Q. Did you create this document?	02:55PM
15	A. Yes.	02:55PM
16	Q. Okay. And am I correct that this is for the 11	02:55PM
17	programs receiving the grant or is this all 24?	02:55PM
18	A. 11.	02:55PM
19	Q. How did you create this document?	02:55PM
20	A. By taking all the social worker logs that are	02:55PM
21	submitted monthly and compiling that information.	02:55PM
22	Q. Okay. Was this document created purposely for	02:55PM
23	Mr. Winter or the other one?	02:55PM
24	A. We usually do a summary at the end of the year	02:55PM
25	anyway or -- well, I just started in 2018, so in 2018.	02:55PM

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1 Q. I understand that when you're speaking -- 02:55PM

2 A. Yes. 02:56PM

3 Q. -- you're speaking about your time as GNETS 02:56PM

4 program specialist. 02:56PM

5 So this was for school year 2018/2019; 02:56PM

6 correct? 02:56PM

7 A. I -- 02:56PM

8 Q. Please stay -- Megan will give you control so 02:56PM

9 you can -- 02:56PM

10 A. Yes, 2018/2019. 02:56PM

11 Q. Okay. Do you have similar summaries for the 02:56PM

12 next school years? 02:56PM

13 A. Yes. 02:56PM

14 Q. Did you do one last school year? 02:56PM

15 A. Yes. 02:56PM

16 Q. Okay. You have -- have you done one for this 02:56PM

17 school year? 02:56PM

18 A. No, because it just started. 02:56PM

19 Q. I just wanted to confirm. 02:56PM

20 Has Mr. Winter requested data on other 02:56PM

21 GNETS related topics? 02:56PM

22 A. I don't know. 02:56PM

23 Q. Have you been made aware of other State Board 02:56PM

24 members requesting data related to GNETS in addition to 02:56PM

25 Mr. Winter and potentially Helen Rice? 02:56PM

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1 A. Not that I'm aware of. 02:56PM

2 Q. Okay. I'm going to give you a document that 02:56PM  
3 was already introduced as Plaintiff's Exhibit 387. 02:57PM

4 (Previously marked Plaintiff's Exhibit 387 02:57PM  
5 introduced into evidence.) 02:57PM

6 THE WITNESS: (Witness examining document.) 02:57PM

7 Q. BY MS. TUCKER: This is an e-mail thread with 02:57PM  
8 the most recent e-mail dated November 2nd, 2020 from you 02:57PM  
9 to Vickie Cleveland, and the subject is: "Form." There 02:57PM  
10 is one attachment. 02:57PM

11 Dr. Stevenson, do you recognize this e-mail 02:57PM  
12 thread? 02:57PM

13 MS. JOHNSON: Can we go off the record for 02:57PM  
14 just a second? 02:57PM

15 MS. TUCKER: Yes. 02:57PM

16 THE VIDEOGRAPHER: Hold on. Off the record 02:57PM  
17 at 2:59 p.m. 02:57PM

18 (Off the record.) 02:57PM

19 THE VIDEOGRAPHER: Stand by. Back on the 03:04PM  
20 record at 3:06 p.m. 03:05PM

21 MS. JOHNSON: And just as a preliminary 03:05PM  
22 matter, we don't have any objections to these documents. 03:05PM  
23 Some of the questions may elicit an objection, but we're 03:05PM  
24 just going to take it question by question. 03:05PM

25 MS. TUCKER: Thanks, Molly. 03:05PM

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1 MS. JOHNSON: Yes.

2 MS. TUCKER: I'll just start back, so we're  
3 on the same page.

4 MS. JOHNSON: Okay.

5 Q. BY MS. TUCKER: I handed you what was  
6 identified already as Plaintiff's Exhibit 387?

03:05PM

7 A. Yes.

03:05PM

8 Q. Okay. And this is an e-mail thread with the  
9 most recent e-mail dated November 2nd, 2020 from you to  
10 Vickie Cleveland, and the subject is: "Form." There is  
11 one attachment.

03:05PM

03:05PM

03:05PM

03:05PM

12 Dr. Stevenson, do you recognize this e-mail  
13 thread?

03:05PM

03:05PM

14 A. Yes.

03:05PM

15 Q. Okay. Let's go down to the first e-mail in the  
16 thread, which is at the bottom of GA00363543. And this  
17 is a October 30th, 2020 e-mail to Joanna Mock from  
18 Whitney Braddock. Do you see that e-mail?

03:05PM

03:05PM

03:06PM

03:06PM

19 A. Yes.

03:06PM

20 Q. Okay. Who are Whitney Braddock and Joanna  
21 Mock?

03:06PM

03:06PM

22 A. GNETS directors.

03:06PM

23 Q. For which programs?

03:06PM

24 A. Whitney is for Cedarwood and Joanna Mock is for  
25 Heartland?

03:06PM

03:06PM

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1 Q. Okay. And do you see where Joanna writes: "I  
2 used the form that Lakesha sent to us and made a Word  
3 document." Do you see that?

4 A. Yes.

5 Q. Okay. What form did you send the regional  
6 GNETS directors?

7 A. (Witness examining document.) The form that  
8 was, basically, what you see in the attachment.

9 Q. Okay. And you're saying that the form included  
10 the information in the attachment, which starts at  
11 GA00363545 --

12 A. (Witness examining document.)

13 Q. -- at the bottom; is that correct?

14 A. (Witness examining document.) Yes.

15 Q. And then the whole form which goes through  
16 GA00363546 and GA00363547?

17 A. Not the form but information -- some of the  
18 information that's in the form.

19 Q. Is there information in this form that you did  
20 not request?

21 A. It's in a different manner in which it was  
22 requested.

23 Q. What manner did you request it in?

24 A. I don't remember the specifics.

25 Q. But you remember it's different?

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1 A. I remember that this is not the exact form that 03:07PM  
2 I sent, but it is very similar. 03:07PM

3 Q. Okay. And you were requesting this information 03:08PM  
4 from the regional GNETS directors? 03:08PM

5 A. Yes. 03:08PM

6 Q. Okay. When you requested this from the 03:08PM  
7 regional GNETS directors, what did you communicate? 03:08PM

8 A. What I put in the e-mail? 03:08PM

9 Q. Yeah. 03:08PM

10 A. I don't remember. 03:08PM

11 Q. Or a phone call? 03:08PM

12 A. I don't remember. 03:08PM

13 Q. Did you originally send it via e-mail? 03:08PM

14 A. I think so. 03:08PM

15 Q. Okay. 03:08PM

16 A. I think so. 03:08PM

17 Q. And you solely requested the information? 03:08PM

18 A. Just a little bit more clarity, I'm sorry. 03:08PM

19 Q. Yeah. Did you provide context on why you were 03:08PM  
20 requesting this information to the regional GNETS 03:08PM  
21 program directors? 03:08PM

22 A. I'm not sure because I don't remember how that 03:08PM  
23 communication went out. 03:08PM

24 Q. Okay. Let's go back to the e-mail thread. 03:08PM

25 Am I correct that Joanna Mock then sends 03:09PM

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1 this document to all the regional GNETS directors and  
2 copies you?

3 A. (Witness examining document.)

4 Q. It's in the November 2nd, 2020 e-mail at  
5 7:51 -- 52 a.m.

6 A. Yes.

7 Q. Okay. And do you see where she writes: "I  
8 wanted to share with you a form that Whitney, in  
9 parenthesis, Cedarwood, developed for us to help with  
10 the collection of student data that Vickie has  
11 requested. It is the same information that is in the  
12 Jotform Lakesha sent us last week. However, you can  
13 type or print and write on it. This is just for your  
14 use, if you like. All the information is still required  
15 to go in the Jotform." Do you see that?

16 A. Yes.

17 Q. Okay. Are the regional programs directors able  
18 to write in Jotform too?

19 A. They're able to type.

20 Q. Type?

21 A. Because it's only on the computer.

22 Q. Okay. And she says Vickie requested this data.  
23 Were you present when Vickie requested this data from  
24 the GNETS directors?

25 A. I'm not sure. I might have been.



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1	Q. Okay.	03:10PM
2	A. It's a -- it's a strong possibility.	03:10PM
3	Q. Do you recall if Vickie gave a reason for	03:10PM
4	requesting this information?	03:10PM
5	A. I don't.	03:10PM
6	Q. Did you receive any questions from regional	03:10PM
7	GNETS directors about this request?	03:10PM
8	A. If -- if I did specifically, I don't remember.	03:10PM
9	Q. This was sent in 2020, correct?	03:10PM
10	A. Yes.	03:10PM
11	Q. Has GaDOE continued to collect this information	03:10PM
12	either in a Jotform or in a document, like, the	03:11PM
13	attachment from the regional GNETS programs?	03:11PM
14	MS. JOHNSON: Objection, just to form of	03:11PM
15	the question.	03:11PM
16	You can answer.	03:11PM
17	MS. TUCKER: I can rephrase it.	03:11PM
18	Q. BY MS. TUCKER: Has -- does GaDOE continue to	03:11PM
19	collect the information represented in the attachment?	03:11PM
20	MS. JOHNSON: Same objection.	03:11PM
21	THE WITNESS: No.	03:11PM
22	Q. BY MS. TUCKER: This was -- this information	03:11PM
23	was collected once?	03:11PM
24	A. In 2020, based on the e-mail.	03:11PM
25	Q. Was it --	03:11PM

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1 A. I have not sent the Jotform out again, so... 03:11PM

2 Q. Was it requested in a different form in 2021 03:11PM

3 from the regional GNETS directors? 03:11PM

4 A. Not from me. Not that I sent out. 03:11PM

5 Q. From Vickie? 03:11PM

6 A. I'm not sure. 03:11PM

7 Q. In 2022, from you? 03:11PM

8 A. Not from me. 03:11PM

9 Q. Okay. I'm going to introduce another document 03:11PM  
10 that was previously introduced. 03:12PM

11 Okay. I'd like to hand over, 03:12PM

12 Dr. Stevenson, what was previously introduced as 03:12PM

13 Plaintiff's Exhibit 386. 03:12PM

14 (Previously Exhibit 386 introduced into 03:12PM  
15 evidence.) 03:12PM

16 Q. BY MS. TUCKER: This is December 2nd, 2020 03:12PM

17 e-mail from Vickie Cleveland to the regional GNETS 03:12PM

18 directors, and you were copied. The subject reads: 03:12PM

19 "File review." 03:12PM

20 A. (Witness examining documents.) 03:12PM

21 Q. Dr. Stevenson, do you recognize this e-mail? 03:12PM

22 A. Yes. 03:12PM

23 Q. Dr. Stevenson, am I correct that Vickie 03:12PM

24 Cleveland is writing to the regional GNETS program 03:12PM

25 directors requesting an IEP file review? 03:12PM

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1 A. Based on the e-mail, yes. 03:13PM

2 Q. Do you have any reason to doubt the contents of 03:13PM  
3 this e-mail? 03:13PM

4 A. No. 03:13PM

5 Q. What is an IEP file review? 03:13PM

6 MS. JOHNSON: Objection. 03:13PM

7 You can answer to the extent that you know. 03:13PM

8 THE WITNESS: The IEP file review was the 03:13PM  
9 information in the previous exhibit. 03:13PM

10 Q. BY MS. TUCKER: Okay. So I -- I'm correct the 03:13PM  
11 directors, during the IEP file review, were to fill out 03:13PM  
12 the information in the last exhibit we looked at? 03:13PM

13 A. On Jotform. 03:13PM

14 Q. On Jotform. And that is Exhibit 387? 03:13PM

15 A. Yes. 03:13PM

16 Q. What steps did you and Vickie Cleveland take 03:13PM  
17 after a director submitted their IEP file review? 03:14PM

18 MS. JOHNSON: Objection on the basis of 03:14PM  
19 privilege. 03:14PM

20 You can still answer that. 03:14PM

21 Q. BY MS. TUCKER: Did you have any conversations 03:14PM  
22 with any regional GNETS director about the IEP file 03:14PM  
23 review separate from the Jotform? 03:14PM

24 A. (Witness examining document.) No. 03:14PM

25 Q. Did you receive any e-mail questions from 03:14PM

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1 regional GNETS program directors regarding the IEP file 03:14PM  
2 review? 03:14PM

3 A. I'm not sure. I don't remember. 03:14PM

4 Q. You don't recall? 03:14PM

5 A. Huh-huh. 03:14PM

6 MS. TUCKER: I'd like the Court Reporter to 03:14PM  
7 mark the following document as Plaintiff's Exhibit 433. 03:14PM

8 (Plaintiff's Exhibit 433 marked for 03:15PM  
9 identification.) 03:15PM

10 THE WITNESS: (Witness examining document.) 03:15PM

11 Q. BY MS. TUCKER: The Bates number on the first 03:15PM  
12 page of this document is GA00961618. This is an 03:15PM  
13 October 21st, 2020, e-mail thread from you to Vickie 03:15PM  
14 Cleveland, with the subject: "Summary." There's one 03:15PM  
15 attachment. 03:15PM

16 Dr. Stevenson, do you recognize the e-mail 03:15PM  
17 thread? 03:15PM

18 A. Yes. 03:15PM

19 Q. Okay. Am I correct that -- let's pull up the 03:15PM  
20 attachment so you have it as well. 03:15PM

21 MS. TUCKER: And I'm going to ask my 03:16PM  
22 colleague Megan Erickson to do that. 03:16PM

23 Q. BY MS. TUCKER: Dr. Stevenson, do you see the 03:16PM  
24 attachment and have the ability to scroll? 03:16PM

25 A. Yes. 03:16PM



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1 Q. Okay. So am I correct that you are looking at 03:16PM  
2 GNETS student transition data? 03:16PM

3 A. Yes. 03:16PM

4 Q. And by student transition, in this context, we 03:16PM  
5 are speaking about what? 03:16PM

6 A. Students who transition, whether it was from 03:16PM  
7 school-based to center-based, center-based to 03:16PM  
8 residential, school-based to return to home school. Any 03:16PM  
9 transition within GNETS. 03:16PM

10 Q. All right. And then am I correct from the 03:16PM  
11 e-mails that Vickie Cleveland is asking you for this 03:16PM  
12 information? 03:16PM

13 A. Yes. 03:16PM

14 Q. For what purpose? 03:16PM

15 A. I'm not sure what the purpose was. 03:16PM

16 Q. How often does GaDOE access the student 03:16PM  
17 transition information? 03:16PM

18 MS. JOHNSON: Objection. 03:16PM

19 THE WITNESS: I'm not sure. 03:17PM

20 Q. BY MS. TUCKER: Have you had to create a 03:17PM  
21 spreadsheet like this since this e-mail? 03:17PM

22 A. I don't think I created this spreadsheet, I 03:17PM  
23 think she did, but I gave her some information. 03:17PM

24 Q. Got it. So she says pull the numbers in her 03:17PM  
25 e-mail? 03:17PM

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1 A. Mm-hmm. 03:17PM

2 Q. So do you think that you pulled the numbers? 03:17PM

3 A. I probably pulled the numbers but just knowing 03:17PM

4 how she sets things up, this looks more like something 03:17PM

5 she set up. 03:17PM

6 Q. Okay. Why do you think it's important for 03:17PM

7 GaDOE to access the student transition information? 03:17PM

8 MS. JOHNSON: Objection. 03:17PM

9 THE VIDEOGRAPHER: Do you want to go off 03:17PM

10 the record briefly. 03:17PM

11 THE WITNESS: No. 03:17PM

12 THE VIDEOGRAPHER: Okay. You're awesome. 03:17PM

13 Q. BY MS. TUCKER: Why would it be important for 03:17PM

14 GaDOE to access the student transition information? 03:17PM

15 MS. JOHNSON: Objection. 03:17PM

16 THE WITNESS: I'm not sure why she was 03:17PM

17 asking for it, so I don't know, but -- I don't know. 03:18PM

18 Q. BY MS. TUCKER: Given your background, do you 03:18PM

19 think it's important for students to transition back to 03:18PM

20 their home schools? 03:18PM

21 MS. JOHNSON: Objection. 03:18PM

22 THE WITNESS: I think students should be in 03:18PM

23 an environment that's individually based on their needs. 03:18PM

24 Q. BY MS. TUCKER: Looking at your e-mail, you 03:18PM

25 note that the sites in yellow did not accurately report 03:18PM

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1 the requested information. Do you see that in your  
2 e-mail?

3 A. I do.

4 Q. How did you know this?

5 A. This information was pulled from the grant  
6 application and that's self-reported by the GNETS  
7 directors. So if Horizon has a center and a school and  
8 they both say zero, then you know that's not correct.

9 Q. Okay. So are you saying that the numbers that  
10 are highlighted in zero, you knew they were inaccurate  
11 because there's zeros -- highlighted in yellow. Scratch  
12 that.

13 Are you saying that the highlighted entries  
14 that reflect zeros were inaccurate because you knew  
15 there were locations?

16 A. Right. So if Woodall, if they don't have a  
17 center or a school, then where are they. So we know  
18 that they exist so it can't be zero.

19 Q. Okay. Is this type of transition also  
20 sometimes referred to as student reintegration by GaDOE,  
21 if it's going back to their home school?

22 A. But this is more than just home school, so this  
23 wouldn't necessarily be referred to as that. Because  
24 this is school to center, center to residential. So it  
25 can be a transition amongst any of those.

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1 Q. Okay. Do you -- do you review data on how long  
2 a student has been in GNETS?

3 A. I do not.

4 Q. How about average length of stay.

5 A. I do not.

6 Q. Do you track GNETS students who exit the GNETS  
7 program and return to the general education setting?

8 A. I do not.

9 Q. Do you think it would be helpful to track the  
10 success of students returning to the general education  
11 environment?

12 MS. JOHNSON: Objection.

13 THE WITNESS: Can you repeat that?

14 Q. BY MS. TUCKER: Do you think it would be  
15 helpful to track the success of students who return to  
16 the general education environment from the regional  
17 GNETS program?

18 MS. JOHNSON: Objection.

19 THE WITNESS: I'm not sure.

20 Q. BY MS. TUCKER: Even with all of -- with your  
21 special education background being in schools, special  
22 education lead, you don't have an opinion?

23 A. I think my opinion is wherever a student is  
24 going to be successful and have their needs met based on  
25 their IEP is where they should be, and that's -- that's



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1 my opinion.

03:21PM

2 Q. Yes. But in your opinion, do you think it  
3 would be helpful to track the success of students when  
4 they return to the general education environment from a  
5 regional GNETS program to see how they're doing and how  
6 they're progressing?

03:21PM

03:21PM

03:21PM

03:21PM

03:21PM

7 MS. JOHNSON: Objection.

03:21PM

8 Q. BY MS. TUCKER: Based on your experiences and  
9 background?

03:21PM

03:21PM

10 A. I think a lot of things would be helpful in  
11 education as a whole that we should track but...

03:22PM

03:22PM

12 Q. Would this fall in that bucket?

03:22PM

13 A. I don't know. I would need more time to think  
14 about it.

03:22PM

03:22PM

15 Q. Okay. We can write this one down.

03:22PM

16 MS. TUCKER: I am handing the Court  
17 Reporter what I'd like to mark as Plaintiff's  
18 Exhibit 434.

03:22PM

03:22PM

19 (Plaintiff's Exhibit 434 marked for  
20 identification.)

03:23PM

03:23PM

21 Q. BY MS. TUCKER: The Bates number on this  
22 document is GA00954277. This is an e-mail showing that  
23 you accepted an invite for a meeting on January 8th,  
24 2020, from Matt Jones, with the subject of: "GNETS  
25 Funding."

03:23PM

03:23PM

03:23PM

03:23PM

03:23PM

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1	A. (Witness examining document.)	03:23PM
2	Q. Dr. Stevenson, do you recognize this invite?	03:23PM
3	A. (Witness examining document.) Yes.	03:23PM
4	Q. Okay. And who is Matt Jones?	03:23PM
5	A. He works with the superintendent.	03:23PM
6	Q. I just want to make sure --	03:24PM
7	MS. TUCKER: Were you able to catch that?	03:24PM
8	THE COURT REPORTER: Works with the	03:24PM
9	superintendant.	03:24PM
10	MS. TUCKER: Works with the superintendant.	03:24PM
11	Q. BY MS. TUCKER: What's his role?	03:24PM
12	A. I don't know the correct terminology for him,	03:24PM
13	but I refer to him as the CFO or the COO or something	03:24PM
14	like that.	03:24PM
15	Q. Does chief of staff sound familiar to you?	03:24PM
16	A. Yes. That's it.	03:24PM
17	Q. Okay. You got the C.	03:24PM
18	A. C something.	03:24PM
19	Q. The location reads Zel's office. Does that	03:24PM
20	refer to Zelphine Smith-Dixon?	03:24PM
21	A. Yes.	03:24PM
22	Q. Okay. And the subject is GNETS Funding,	03:24PM
23	correct?	03:24PM
24	A. Yes.	03:24PM
25	Q. Dr. Stevenson, what was discussed at this	03:24PM

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1	meeting that you accepted?	03:24PM
2	A. I honestly do not recall being at this meeting.	03:24PM
3	Q. Do you recall being at any meetings with Matt	03:24PM
4	Jones?	03:24PM
5	A. I don't. Except for, like, all DOE meetings?	03:24PM
6	Q. All GaDOE?	03:24PM
7	A. Like, everybody from GaDOE meets at Christmas	03:24PM
8	and he's there.	03:24PM
9	Q. Okay.	03:24PM
10	A. So I don't recall outside of that.	03:25PM
11	Q. You don't recall attending meetings on GNETS	03:25PM
12	funding?	03:25PM
13	A. No.	03:25PM
14	MS. TUCKER: Okay. I'd like the Court	03:25PM
15	Reporter to mark this document as Plaintiff's	03:25PM
16	Exhibit 435.	03:25PM
17	(Plaintiff's Exhibit 435 marked for	03:25PM
18	identification.)	03:25PM
19	Q. BY MS. TUCKER: Okay. The Bates number on this	03:25PM
20	document is GA02409892. This is an e-mail invite sent	03:25PM
21	by you on September 11th, 2020, for a meeting on	03:26PM
22	October 16th, 2020. You invited Dante McKay, Vickie	03:26PM
23	Cleveland, Stacey Suber-Drake, and Monica Patel. The	03:26PM
24	subject reads: "GNETS DBHDD collaboration meeting."	03:26PM
25	A. (Witness examining document.)	03:26PM

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1	Q. Dr. Stevenson, do you recall the meeting	03:26PM
2	invite?	03:26PM
3	A. Yes.	03:26PM
4	Q. Please confirm whether this meeting took place?	03:26PM
5	A. I'm not sure. Sometimes we schedule meetings	03:26PM
6	and they have to be canceled, so I couldn't speak to if	03:26PM
7	this specific one was held or not.	03:26PM
8	Q. Do you recall meeting with Dante McKay, Vickie,	03:26PM
9	Stacey, and Monica Patel on GNETS DBHDD collaboration?	03:26PM
10	A. I do but I don't remember if it was this.	03:26PM
11	Q. Not necessarily this meeting invite?	03:26PM
12	A. Yes.	03:27PM
13	Q. But you do recall meeting with them?	03:27PM
14	A. Yes.	03:27PM
15	Q. Okay. Have you met more than once with DBHDD	03:27PM
16	on collaboration?	03:27PM
17	A. Yes.	03:27PM
18	Q. Have you met with DBHDD recently on	03:27PM
19	collaboration?	03:27PM
20	A. I have not.	03:27PM
21	Q. Has someone else?	03:27PM
22	A. I don't know.	03:27PM
23	Q. Okay. What -- how have you collaborated with	03:27PM
24	DBHDD, the GNETS program and DBHDD?	03:27PM
25	A. I -- I don't know.	03:27PM

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1 Q. So you've met a few times with DBHDD on 03:27PM  
2 collaboration, you testified to that a moment ago, yes? 03:28PM

3 A. We met with them; now what was discussed 03:28PM  
4 specifically, I couldn't tell you because I don't 03:28PM  
5 remember. But we have met at least twice. 03:28PM

6 Q. You don't recall what was discussed at a 03:28PM  
7 meeting with DBHDD or what themes were discussed? 03:28PM

8 A. I know in one of the meetings Vickie discussed 03:28PM  
9 with Dante because I'm -- I don't really discuss much 03:28PM  
10 but Vickie discussed with Dante about trying to get more 03:28PM  
11 information on APEX. 03:28PM

12 Q. What's APEX? 03:28PM

13 A. It's within DBHDD where they provide wrap 03:28PM  
14 around or mental health support to schools, through 03:29PM  
15 DBHDD. 03:29PM

16 Q. What is your understanding of why it was 03:29PM  
17 created? 03:29PM

18 A. APEX? 03:29PM

19 Q. Yes. 03:29PM

20 A. I don't know. 03:29PM

21 Q. What needs does it address for the State? 03:29PM

22 MS. JOHNSON: Objection. 03:29PM

23 THE WITNESS: I don't know. I just know 03:29PM  
24 it -- what they do. 03:29PM

25 Q. BY MS. TUCKER: Okay. Do you recall when you 03:29PM

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1	first learned of the APEX program?	03:29PM
2	A. I don't but I know it was after I started	03:29PM
3	working GNETS.	03:29PM
4	Q. Okay. So after October 2018?	03:29PM
5	A. Yes.	03:29PM
6	Q. Is it your understanding that DBHDD has	03:29PM
7	responsibility over the APEX program?	03:29PM
8	MS. JOHNSON: Objection.	03:29PM
9	THE WITNESS: I'm not sure who has	03:29PM
10	responsibility over it, but I know Dante was the person	03:29PM
11	we were asking about it.	03:30PM
12	Q. BY MS. TUCKER: So he has some stake in APEX or	03:30PM
13	some understanding?	03:30PM
14	A. Yeah. I think -- I guess.	03:30PM
15	Q. And what was Vickie asking Dante about APEX?	03:30PM
16	MS. JOHNSON: Objection.	03:30PM
17	THE WITNESS: I think just more of an	03:30PM
18	understanding of how it -- how the different programs	03:30PM
19	are in different school districts. Like how APEX gets	03:30PM
20	to a school district, what is the process for that.	03:30PM
21	Q. BY MS. TUCKER: And what is the process?	03:30PM
22	A. I didn't have a great understanding when he	03:30PM
23	explained it so I couldn't repeat it.	03:30PM
24	Q. Did you take notes?	03:30PM
25	A. I don't think so.	03:30PM

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1 Q. Did you discuss with Vickie Cleveland after the 03:30PM  
2 meeting? 03:31PM

3 A. I think my discussion was I don't understand. 03:31PM

4 Q. Okay. In other meetings with Dante McKay, did 03:31PM  
5 you ask for further clarification? 03:31PM

6 A. I don't recall. 03:31PM

7 Q. From your understanding, do you know how 03:31PM  
8 services and supports from the APEX program reach 03:31PM  
9 schools? 03:31PM

10 A. Very muddled, probably not accurate 03:31PM  
11 understanding. 03:31PM

12 Q. What is your potentially muddled understanding? 03:31PM

13 A. That the school -- the school districts have to 03:31PM  
14 accept the proposal from APEX and it's only at certain 03:31PM  
15 schools. So even if a school district says yes, APEX 03:31PM  
16 can come into the district, it's not at all schools in 03:32PM  
17 that district. 03:32PM

18 Q. Okay. 03:32PM

19 A. And if a district is in an area where there's 03:32PM  
20 not a lot of providers, then the options will be less 03:32PM  
21 for those school districts to receive APEX. 03:32PM

22 Q. Okay. Do you know how the APEX program is 03:32PM  
23 funded? 03:32PM

24 A. I do not. 03:32PM

25 Q. Does GaDOE have a role with respect to the APEX 03:32PM

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1	program?	03:32PM
2	A. Not to my understanding.	03:32PM
3	Q. Are there other entities outside of DBHDD that	03:32PM
4	have responsibilities relating to APEX?	03:32PM
5	A. I don't know.	03:32PM
6	Q. What is the target population for the APEX	03:32PM
7	program?	03:32PM
8	MS. JOHNSON: Objection.	03:32PM
9	THE WITNESS: I don't know that either.	03:32PM
10	Q. BY MS. TUCKER: Do you know if it's similar to	03:32PM
11	the target population of the GNETS program?	03:33PM
12	MS. JOHNSON: Objection.	03:33PM
13	THE WITNESS: I don't.	03:33PM
14	Q. BY MS. TUCKER: Are there specific criteria for	03:33PM
15	you receiving APEX services?	03:33PM
16	A. I don't know.	03:33PM
17	MS. TUCKER: I'd like to introduce	03:33PM
18	Plaintiff's Exhibit 436.	03:33PM
19	(Plaintiff's Exhibit 436 marked for	03:33PM
20	identification.)	03:33PM
21	Q. BY MS. TUCKER: The Bates number on the first	03:33PM
22	page of this exhibit is GA00953806. This is an e-mail	03:33PM
23	thread with the most recent e-mail dated November 12th,	03:34PM
24	2019, from you to Lisa -- Futch?	03:34PM
25	A. Futch.	03:34PM



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1 Q. Futch. Thank you. The subject of the e-mail  
2 is: "GNETS/APEX."

3 A. (Witness examining documents.)

4 Q. Dr. Stevenson, do you recognize this e-mail?

5 A. Yes.

6 Q. And earlier we confirmed that Lisa Futch is the  
7 regional director for Coastal Academy?

8 A. Yes.

9 Q. Am I correct that in the earliest e-mail, you  
10 were requesting regional GNETS directors to provide  
11 information on how many of their students received  
12 mental health services via the APEX program?

13 A. Yes.

14 Q. Why did you ask this?

15 A. If I remember correctly, we were trying to get  
16 an understanding of APEX more and how, if any GNETS  
17 students were receiving any APEX services.

18 Q. It was something you were looking into with  
19 Vickie?

20 A. Yes. So that we can have a conversation, I  
21 think, with Dante, to try to get more understanding.

22 Q. Were you advised by someone else to ask this  
23 question?

24 A. I don't know if Vickie was, I wasn't. I was  
25 advised by Vickie.

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1 Q. What were the responses that you received from 03:35PM  
2 the regional GNETS directors? 03:35PM

3 A. Oh, I don't know. I would have to look back at 03:35PM  
4 that. 03:35PM

5 Q. Do you recall if there were any GNETS students 03:35PM  
6 receiving APEX services? 03:35PM

7 A. I don't know. I don't -- I mean, I don't 03:35PM  
8 remember. 03:35PM

9 Q. Do you recall if it was many students? 03:35PM

10 A. There's a lot in my brain since 2019, so I 03:36PM  
11 couldn't tell you. 03:36PM

12 Q. Do you see where Lisa Futch writes in her 03:36PM  
13 12:21 p.m. e-mail that she was told that GNETS students 03:36PM  
14 could not receive APEX services? 03:36PM

15 A. Yes. 03:36PM

16 Q. Did other regional GNETS program share similar 03:36PM  
17 responses? 03:36PM

18 A. I don't know. I don't remember. 03:36PM

19 Q. Is it your understanding that Ms. Futch is 03:36PM  
20 correct that this is -- that GNETS students cannot 03:36PM  
21 receive APEX services? 03:36PM

22 A. I'm not sure. 03:36PM

23 Q. Do you see in the top e-mail with the 5:23 p.m. 03:36PM  
24 time stamp that you write: "We are trying to get 03:36PM  
25 clarification on the exact issue"? 03:36PM

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1 A. Yes. 03:36PM

2 Q. What does we refer to? 03:36PM

3 A. We, I guess, would be Vickie and myself. 03:36PM

4 Q. It was Vickie and you? 03:36PM

5 A. Mm-hmm. Yes. 03:37PM

6 Q. Did you ultimately receive clarification on 03:37PM

7 whether GNETS students could receive APEX services? 03:37PM

8 A. I'm not sure clarification was received as far 03:37PM

9 as I receiving it. But I don't know if someone else 03:37PM

10 received that clarification. 03:37PM

11 Q. Had you been advised by anyone whether GNETS 03:37PM

12 students can receive APEX services? 03:37PM

13 A. Not specifically. But through the muddled 03:37PM

14 understanding that I just stated, if a GNETS and a LEA, 03:37PM

15 if the LEA has not accepted APEX within that LEA, then 03:37PM

16 it can't touch the GNETS kids. So it's more of the 03:37PM

17 LEA's decision for APEX. 03:37PM

18 Q. Do you think GNETS can benefit through an APEX 03:37PM

19 partnership with the community service board? 03:38PM

20 MS. JOHNSON: Objection. 03:38PM

21 THE WITNESS: I think all students can 03:38PM

22 benefit. 03:38PM

23 Q. BY MS. TUCKER: Why? 03:38PM

24 A. Because all students could benefit from 03:38PM

25 wraparound services. 03:38PM

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1 Q. And could you define wraparound services for 03:38PM  
2 me? 03:38PM

3 A. I probably don't have a textbook definition, so 03:38PM  
4 no. 03:38PM

5 Q. Can you give it to me in your words? 03:38PM

6 A. Wraparound services can mean anything that 03:38PM  
7 touches the child. For example, there is a social 03:38PM  
8 worker, there is someone who helps with eyeglasses. 03:38PM  
9 There's someone that helps the child get a dental exam. 03:38PM  
10 So the whole child, not just the educational piece. 03:38PM

11 Q. Thank you. Have you taken any steps since this 03:38PM  
12 2019 e-mail to increase GNETS student access to APEX? 03:39PM

13 A. That is not someone in my position to have the 03:39PM  
14 ability to do that. 03:39PM

15 Q. Whose position would it be? 03:39PM

16 A. Someone that's not me. 03:39PM

17 Q. So not the GNETS program specialist? 03:39PM

18 A. Not a program specialist. I do not make 03:39PM  
19 decisions on APEX and services. 03:39PM

20 Q. Do you know if Vickie Cleveland has explored 03:39PM  
21 that? 03:39PM

22 A. I don't. 03:39PM

23 MS. TUCKER: I'd like to introduce 03:39PM  
24 Plaintiff's Exhibit 437. 03:39PM

25 (Plaintiff's Exhibit 437 marked for 03:39PM

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1 identification.)

03:40PM

2 Q. BY MS. TUCKER: The Bates number on this  
3 exhibit is GA00951662. This is a September 4th, 2019,  
4 e-mail invite from you to Vickie Cleveland with the  
5 subject: "SEDNET." That's S-E-D-N-E-T. Ms. Cleveland  
6 then replays to your invite.

03:40PM

03:40PM

03:40PM

03:40PM

03:40PM

7 Dr. Stevenson, do you recognize this invite  
8 and e-mail?

03:40PM

03:40PM

9 A. Yes.

03:40PM

10 Q. Okay. What is SEDNET?

03:40PM

11 A. SEDNET is a program in Florida that is similar  
12 to GNETS.

03:40PM

03:40PM

13 Q. In what ways is it similar?

03:40PM

14 A. It is on their continuum in the State of  
15 Florida within the continuum of services for special  
16 needs students.

03:40PM

03:41PM

03:41PM

17 Q. With similar needs as the students in the GNETS  
18 program?

03:41PM

03:41PM

19 A. Yes.

03:41PM

20 Q. Do you recall this meeting?

03:41PM

21 A. I don't recall what was discussed.

03:41PM

22 Q. Why were you reviewing the SEDNET model in  
23 Florida.

03:41PM

03:41PM

24 A. I don't know.

03:41PM

25 Q. Was that something you were asked to do?

03:41PM

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1 A. I wasn't aware of SEDNET until after I became a 03:41PM  
2 program specialist for GNETS, so I couldn't have known 03:41PM  
3 too much about it. 03:41PM

4 Q. So did Vickie ask you to look into SEDNET? 03:41PM

5 A. I'm not sure. I don't recall why this meeting 03:41PM  
6 was set, but on 2019 she told me to review it. So that 03:41PM  
7 might have been my first time even looking at the 03:41PM  
8 information, so I don't know. 03:42PM

9 Q. Have you continued to learn about SEDNET since 03:42PM  
10 2019? 03:42PM

11 A. Not -- no. 03:42PM

12 Q. Have you spoken with anyone in Florida about 03:42PM  
13 SEDNET? 03:42PM

14 A. I have not. 03:42PM

15 Q. Have you joined calls with anyone in Florida on 03:42PM  
16 SEDNET? 03:42PM

17 A. Not that I can recall. 03:42PM

18 Q. Okay. 03:42PM

19 MS. TUCKER: I'd like to introduce 03:42PM  
20 Plaintiff's Exhibit 438. 03:42PM

21 (Plaintiff's Exhibit 438 marked for 03:43PM  
22 identification.) 03:43PM

23 THE WITNESS: (Witness examining document.) 03:43PM

24 Q. BY MS. TUCKER: The Bates number on the first 03:43PM  
25 page of this document is GA00956103. This is an 03:43PM

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1	April 13th, 2020 e-mail thread with the most recent	03:43PM
2	e-mail being from you to Vickie Cleveland, and the	03:43PM
3	subject reads: "Delivery of services."	03:43PM
4	A. (Witness examining document.)	03:43PM
5	Q. Dr. Stevenson, do you recognize this e-mail?	03:43PM
6	MS. JOHNSON: Go off the record.	03:43PM
7	THE VIDEOGRAPHER: One moment. Off the	03:43PM
8	record at 3:44 p.m.	03:43PM
9	(Off the record.)	03:45PM
10	THE VIDEOGRAPHER: Okay. Everything	03:45PM
11	looking good to Zoom still.	03:45PM
12	THE WITNESS: Mm-hmm.	03:45PM
13	THE VIDEOGRAPHER: Back on the record at	03:45PM
14	3:47 p.m.	03:45PM
15	Q. BY MS. TUCKER: Dr. Stevenson, you have what	03:45PM
16	was introduced as Plaintiff's Exhibit 438. The Bates	03:46PM
17	number on the first page of this document is GA00956103.	03:46PM
18	This is an April 13th, 2020 e-mail thread with the most	03:46PM
19	recent e-mail being from you to Vickie Cleveland, and	03:46PM
20	the subject reads: "Delivery of services."	03:46PM
21	A. (Witness examining document.)	03:46PM
22	Q. Do you recognize this e-mail?	03:46PM
23	A. Yes.	03:46PM
24	Q. Okay. In the first e-mail Vickie Cleveland	03:46PM
25	asks you to, "Review the delivery of school-based or	03:46PM

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1 mental health services for emotional disordered students 03:46PM  
2 in Texas, California, Tennessee, and Illinois," correct? 03:46PM

3 A. Correct. 03:46PM

4 Q. Did Vickie Cleveland tell you why she was 03:46PM  
5 asking you to research these states? 03:46PM

6 A. No. 03:46PM

7 Q. Did you ask why you were researching these 03:46PM  
8 states? 03:46PM

9 A. I don't know. I probably did. 03:46PM

10 Q. Why -- why were you looking into these states? 03:47PM

11 MS. JOHNSON: And I'll just caution the 03:47PM  
12 witness not to respond with any testimony that would 03:47PM  
13 reveal privileged information, but to the extent that it 03:47PM  
14 doesn't, you can respond. 03:47PM

15 THE WITNESS: I'm trying to think about 03:47PM  
16 what she said. She just said she needed the 03:47PM  
17 information. 03:47PM

18 Q. BY MS. TUCKER: She said she'll discuss at the 03:47PM  
19 meeting -- at a meeting, the next day, correct? 03:47PM

20 A. Yes. 03:47PM

21 Q. Do you recall meeting? 03:47PM

22 A. We meet a lot, so... 03:47PM

23 Q. Do you recall discussing Texas, California, 03:47PM  
24 Tennessee, and Illinois; the services mental health and 03:47PM  
25 school-based services for emotional disordered students? 03:48PM



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1 A. I can't recall the specifics but I'm sure I 03:48PM  
2 did, but I don't recall what specifically was said. 03:48PM

3 Q. Do you recall doing this research? 03:48PM

4 A. I do. 03:48PM

5 Q. Do you see in your reply back to Vickie 03:48PM  
6 Cleveland that you asked whether you should send an 03:48PM  
7 e-mail requesting additional information? 03:48PM

8 A. Yes. 03:48PM

9 Q. What did Vickie Cleveland reply? 03:48PM

10 A. I don't know. 03:48PM

11 Q. Did you send an e-mail requesting additional 03:48PM  
12 information related to Tennessee and Texas? 03:48PM

13 A. I don't recall doing that. I don't recall. 03:48PM

14 MS. TUCKER: I'd like to introduce 03:49PM  
15 Plaintiff's Exhibit 439. 03:49PM

16 (Plaintiff's Exhibit 439 marked for 03:49PM  
17 identification.) 03:49PM

18 MS. TUCKER: And this is going to have an 03:49PM  
19 electronic component to it. 03:49PM

20 Q. BY MS. TUCKER: The Bates number on the first 03:49PM  
21 page of this document is GA00956213. This is an 03:49PM  
22 April 23rd, 2020, e-mail you sent to Vickie Cleveland. 03:49PM  
23 There is no subject but there is one attachment. 03:49PM

24 MS. TUCKER: I'm going to ask my colleague 03:49PM  
25 to -- 03:49PM

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1	Q. BY MS. TUCKER: Or Dr. Stevenson, do you	03:49PM
2	recognize the e-mail?	03:49PM
3	A. Yes.	03:49PM
4	MS. TUCKER: Okay. I'm going to ask my	03:49PM
5	colleague to share the attachment via Zoom.	03:50PM
6	Q. BY MS. TUCKER: Dr. Stevenson, can you see the	03:50PM
7	attachment?	03:50PM
8	A. I can.	03:50PM
9	Q. And are you able to move around and examine?	03:50PM
10	A. Yes.	03:50PM
11	Q. Do you recognize the attachment?	03:50PM
12	A. I do.	03:50PM
13	Q. Okay. Let's take a look at this attachment.	03:50PM
14	Am I correct that at the top of the chart	03:50PM
15	reads therapeutic supports other states?	03:50PM
16	A. Yes.	03:50PM
17	Q. And am I correct there's information related to	03:50PM
18	Texas, California, Illinois, Tennessee, and Alabama?	03:50PM
19	A. (Witness examining document.) Yes.	03:50PM
20	Q. Did you create this chart?	03:50PM
21	A. I did not create the chart.	03:50PM
22	Q. Did you fill in the information in the chart?	03:50PM
23	A. For some of these, yes.	03:51PM
24	Q. Which ones?	03:51PM
25	A. The ones listed on the previous e-mail.	03:51PM

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1 Q. Okay. So I would be correct that you filled it 03:51PM  
2 in for Texas, California, Tennessee, and Illinois? 03:51PM

3 A. Yes. 03:51PM

4 Q. And not Alabama? 03:51PM

5 A. I'm not sure if she did or I did, but. 03:51PM

6 Q. Who asked you to create this chart? 03:51PM

7 A. Vickie Cleveland. 03:51PM

8 Q. Why? 03:51PM

9 A. I'm not sure. 03:51PM

10 Q. Did you ask? 03:51PM

11 A. I probably did. 03:51PM

12 Q. What did she respond? 03:51PM

13 A. I'm not quite sure of the specifics of what she 03:52PM  
14 responded, but I know that not only within GNETS but 03:52PM  
15 within special Ed as a whole, we look and see what other 03:52PM  
16 states are doing to see if there can be any correlation. 03:52PM  
17 So within special Ed as a whole, we look to other states 03:52PM  
18 for -- just to do like what is Oregon doing in special 03:52PM  
19 Ed and things like that. So this was probably just one 03:52PM  
20 of those things. 03:52PM

21 Q. Has this informed any changes or 03:52PM  
22 recommendations to the GNETS program, this research? 03:52PM

23 A. I'm not sure. Once I do my part, I'm kind of 03:52PM  
24 not involved. 03:53PM

25 Q. You don't participate in substantive 03:53PM

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1	discussions given your background on this topic?	03:53PM
2	A. I might speak with Vickie about it, but I don't	03:53PM
3	speak to higher ups about it.	03:53PM
4	Q. So what were your thoughts looking at this.	03:53PM
5	What type did you -- what did you take away from this	03:53PM
6	research?	03:53PM
7	MS. JOHNSON: Objection.	03:53PM
8	THE WITNESS: That all the states do	03:53PM
9	similar things, just in a different way.	03:53PM
10	Q. BY MS. TUCKER: You mentioned Oregon a moment	03:53PM
11	ago.	03:53PM
12	A. Mm-hmm.	03:53PM
13	Q. Did you look at Oregon?	03:53PM
14	A. I was just using that as an example.	03:53PM
15	Q. Why were these states selected?	03:53PM
16	A. That's what she asked me to do.	03:53PM
17	Q. Are you still reviewing programs in other	03:53PM
18	states?	03:53PM
19	A. No.	03:54PM
20	Q. Okay.	03:54PM
21	A. I haven't been asked to do that.	03:54PM
22	Q. Do you recall how Alabama got added?	03:54PM
23	A. I don't because I didn't create it. I just	03:54PM
24	filled in my part, so I don't know.	03:54PM
25	Q. How did you find out the information?	03:54PM

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1 A. Just looking on the website. 03:54PM

2 Q. Did you talk to anyone? 03:54PM

3 A. No. 03:54PM

4 Q. In the states? 03:54PM

5 A. No. 03:54PM

6 Q. Okay. I want to give you what was already 03:54PM

7 introduced as Plaintiff's Exhibit 395. 03:54PM

8 (Previously marked Exhibit 395 introduced 03:54PM

9 into evidence.) 03:54PM

10 THE WITNESS: (Witness examining document.) 03:55PM

11 Q. BY MS. TUCKER: Dr. Stevenson, this is a 03:55PM

12 September 19th, 2018 e-mail from the Interagency 03:55PM

13 Directors Team, to the Interagency Directors Team as 03:55PM

14 well as many named individuals. The subject of the 03:55PM

15 e-mail is: "October IDT meeting." And there are two 03:55PM

16 attachments. 03:55PM

17 A. This was in 2018, you said? 03:55PM

18 Q. Yep. That is correct. And the Interagency 03:55PM

19 Directors Team, I'm correct that's the IDT that we 03:55PM

20 spoke about earlier? 03:55PM

21 A. Yes. 03:55PM

22 Q. We can continue going through it. 03:56PM

23 A. Okay. 03:56PM

24 Q. Do you recall receiving any invites from the 03:56PM

25 IDT? 03:56PM

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1 A. I'm not sure if I was receiving them in 2018, 03:56PM  
2 that's why I'm asking. Because this is right after I 03:56PM  
3 just started. 03:56PM

4 Q. Okay. If you want to turn to page GA00030907. 03:56PM

5 A. So I'm there. 03:56PM

6 Q. Yes. I just want to confirm that you see your 03:56PM  
7 name as an attendee. 03:56PM

8 A. I do. It's spelled wrong, but I see it. 03:56PM

9 Q. You assume that it's you? 03:56PM

10 A. I assume that it's me. 03:56PM

11 Q. Okay. This was actually in September 2018 03:56PM  
12 before you officially assumed the position, is that 03:56PM  
13 correct, as GNETS program specialist, or had you already 03:56PM  
14 assumed the position at this point? 03:56PM

15 A. I don't even remember the month I got hired, so 03:56PM  
16 I don't know. 03:56PM

17 Q. Okay. 03:56PM

18 A. I just know it's 2018. 03:56PM

19 Q. And applied in July? 03:56PM

20 A. I guess. 03:56PM

21 Q. We earlier looked at -- 03:57PM

22 A. Based on the e-mails, yes. 03:57PM

23 Q. And again, you have no reason to -- do you have 03:57PM  
24 a reason to doubt -- 03:57PM

25 A. No. 03:57PM

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1 Q. -- the e-mails?

03:57PM

2 A. I just was looking and couldn't remember if --  
3 because I didn't -- yes, yes.

03:57PM

03:57PM

4 Q. So we spoke about the IDT a little bit earlier.  
5 What agencies are represented?

03:57PM

03:57PM

6 A. Many.

03:57PM

7 Q. Many. So if we look at the page we were  
8 looking at a moment ago with the attendance on

03:57PM

03:57PM

9 GA00030907, in the parenthesis, does that represent --  
10 next to names -- the agencies?

03:57PM

03:57PM

11 A. Yes.

03:57PM

12 Q. Okay. And you said earlier that you attend for  
13 GaDOE?

03:57PM

03:57PM

14 A. I am one of the attendees.

03:57PM

15 Q. Who is another attendee from GaDOE?

03:57PM

16 A. If you look on the page, I believe Rebecca  
17 Blanton was there.

03:57PM

03:57PM

18 Q. Who is Rebecca Blanton?

03:58PM

19 A. She used to work -- I'm not sure if she worked  
20 in PBIS or if she worked in another department. I can't  
21 remember.

03:58PM

03:58PM

03:58PM

22 Q. And what is your role when you attend an IDT  
23 meeting?

03:58PM

03:58PM

24 A. I don't have a role. I'm just an attendee.

03:58PM

25 Q. Do you take notes, do you report back?

03:58PM

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1 A. Well, they send out the notes --

03:58PM

2 Q. Okay.

03:58PM

3 A. -- to everybody, after the meeting. They sent  
4 out. I guess this is what this is. So, you don't have  
5 to take notes because they have somebody taking it for  
6 you.

03:58PM

03:58PM

03:58PM

03:58PM

7 Q. Okay. Do you speak about it later with folks  
8 at GaDOE?

03:58PM

03:58PM

9 A. No. I speak with Vickie.

03:58PM

10 Q. You speak with Vickie about --

03:58PM

11 A. Mm-hmm.

03:58PM

12 Q. -- the meetings?

03:58PM

13 A. Mm-hmm. If there's something to speak about.

03:58PM

14 Q. Is there -- are there times where you and  
15 Vickie speak about what's discussed?

03:58PM

03:58PM

16 A. I mean, it depends on what -- every -- every  
17 IDT meeting has a different -- it's not the same every  
18 time. So it depends on the topic. Like you see the  
19 agenda. If it's something on the agenda that is  
20 something that we can -- that we need to talk about or  
21 we're like that was a pretty good presentation, then we  
22 will but not always.

03:59PM

03:59PM

03:59PM

03:59PM

03:59PM

03:59PM

03:59PM

23 Q. Does your participation inform your role as a  
24 GNETS program specialist?

03:59PM

03:59PM

25 A. Meaning?

03:59PM



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1 Q. Meaning do you learn things at the IDT 03:59PM  
2 meetings, in general, not this meeting, just in general, 03:59PM  
3 that you then bring back to the GNETS program? 03:59PM

4 A. Yes. Sometimes. 03:59PM

5 Q. Can you give me an example? 03:59PM

6 A. For example, recently at an IDT meeting, they 04:00PM  
7 discussed a webinar that was going to be presented that 04:00PM  
8 was talking about challenges that students are facing 04:00PM  
9 post COVID and what some LEAs were doing and there was a 04:00PM  
10 superintendent, Dr. Morcease Beasley from Clayton 04:00PM  
11 County, who presented. There were two or three other 04:00PM  
12 people. So we attended, you know, signed up for the 04:00PM  
13 webinar and was in attendance on the webinar because of 04:00PM  
14 my attendance at IDT, I knew about that. So things like 04:00PM  
15 that. 04:00PM

16 Q. Thank you. Okay. Well, we already saw on 04:00PM  
17 Page 00030907 that you attended, alongside Vickie 04:00PM  
18 Cleveland and Rebecca Blanton from GaDOE, correct? 04:00PM

19 A. When -- yes. Yes. 04:01PM

20 Q. Okay. At this meeting. Let's go to the bottom 04:01PM  
21 of the Page GA00030908. 04:01PM

22 A. Okay. 04:01PM

23 Q. Do you see where it says DOE - GNETS, and then 04:01PM  
24 in parenthesis Vickie Cleveland? 04:01PM

25 A. I do. 04:01PM

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1 Q. Okay. Am I correct that she introduced you to  
2 the group as a district liaison who is joining to work  
3 with increasing supporting in GNETS?

4 A. Yes.

5 Q. Did you hold the role of district liaison?

6 A. That's what -- if -- when did we say I got  
7 hired?

8 Q. October 2018.

9 A. So I was a district liaison before I was --  
10 which is still a program specialist, it's just what they  
11 call your role within RDA.

12 Q. Okay.

13 A. So I don't know dates, but either I was working  
14 as a district liaison more with GNETS or I was a program  
15 specialist for GNETS. I don't know which one. I would  
16 need to look back and see when I got hired.

17 Q. Okay. The notes then read: "There have been no  
18 updates on the GNETS lawsuit, so we are just trying to  
19 move forward and do good work for the students. We will  
20 be moving students back to home school districts. Our  
21 area of focus is on integration as kids return to their  
22 home schools, so personnel can be familiar and  
23 prepared." Do you see that?

24 A. I do.

25 Q. Since this meeting, how has GaDOE assisted

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1 with, "Moving students back to their home school  
2 districts"?

04:02PM

04:02PM

3 MS. JOHNSON: Objection.

04:02PM

4 THE WITNESS: I see that but I don't recall  
5 her saying that.

04:02PM

04:02PM

6 Q. BY MS. TUCKER: Do you have reasons to doubt  
7 the notes?

04:02PM

04:03PM

8 A. It's a possibility that the person who took the  
9 notes didn't hear her correctly. I don't know, but I  
10 don't recall her saying that.

04:03PM

04:03PM

04:03PM

11 Q. Since this -- one second.

04:03PM

12 Since this meeting has GaDOE focused on,  
13 "Integration as kids return to their home schools"?

04:03PM

04:03PM

14 MS. JOHNSON: Objection.

04:03PM

15 THE WITNESS: (Witness examining document.)  
16 I think conversations are always had to say that  
17 children should be supported in the -- in a placement in  
18 which it fits their needs.

04:03PM

04:03PM

04:03PM

04:03PM

19 Q. BY MS. TUCKER: Did GaDOE messages focus on  
20 integration to the regional GNETS programs?

04:03PM

04:04PM

21 MS. JOHNSON: Objection.

04:04PM

22 THE WITNESS: The regional GNETS programs,  
23 the conversation is always do what's best for children,  
24 do what's best within the context of their needs and  
25 IEP.

04:04PM

04:04PM

04:04PM

04:04PM

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1 Q. BY MS. TUCKER: In your opinion are other 04:04PM  
2 regional GNETS programs doing what is best for students? 04:04PM

3 A. I am not in the IEP meetings to determine how 04:04PM  
4 that decision is made, so I couldn't really speak to 04:04PM  
5 that. 04:04PM

6 Q. Has GaDOE worked to assure that school 04:04PM  
7 personnels are, "Familiar and prepared"? 04:04PM

8 MS. JOHNSON: Objection. 04:04PM

9 THE WITNESS: Familiar and prepared for? 04:04PM

10 Q. BY MS. TUCKER: In the notes, "Our area of 04:04PM  
11 focus is on integration as kids return to their home 04:04PM  
12 schools, so personnel can be familiar and prepared". Do 04:04PM  
13 you see that? 04:05PM

14 A. (Witness examining document.) 04:05PM

15 Q. It's on the top of GA00030909. 04:05PM

16 A. Yes, I see it. But as I stated previously, I 04:05PM  
17 don't recall her saying that. 04:05PM

18 Q. Dr. Stevenson, so were they -- let's see. 04:05PM  
19 Sorry. 04:05PM

20 Are the schools -- or is the regional GNETS 04:05PM  
21 program or -- excuse me. Scratch that. 04:05PM

22 Is the regional GNETS program doing 04:05PM  
23 anything to assist in preparing the personnel for 04:05PM  
24 successful integration of the students back to their 04:05PM  
25 home schools? 04:05PM

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1 A. Each individual program would be responsible 04:05PM  
2 for doing that preparation, whatever that entails. 04:06PM

3 Q. Does GaDOE provide information or tips or 04:06PM  
4 techniques on that? 04:06PM

5 A. On -- for personnel? 04:06PM

6 Q. Yes. 04:06PM

7 A. To support -- personnel receive training on 04:06PM  
8 moving students within the continuum through their LEAs, 04:06PM  
9 so whether that's GNETS whether that's going from a self 04:06PM  
10 contain to a co teaching, that's all support that is 04:06PM  
11 provided within the LEAs for teachers. 04:06PM

12 Q. Okay. 04:06PM

13 MS. TUCKER: Are we on Exhibit 440? 04:07PM

14 THE COURT REPORTER: Yes. 04:07PM

15 MS. TUCKER: Okay. I'd like to introduce 04:07PM  
16 this as Plaintiff's Exhibit 440. 04:07PM

17 (Plaintiff's Exhibit 440 marked as 04:07PM  
18 identification.) 04:07PM

19 Q. BY MS. TUCKER: Dr. Stevenson, do you see the 04:07PM  
20 Bates number on the bottom of this document is 04:07PM  
21 GA00940369. It's an October 2nd, 2018 e-mail from 04:07PM  
22 Vickie Cleveland to the regional GNETS program 04:07PM  
23 directors. And you were cc'd with a subject of: 04:07PM  
24 "Congratulations." 04:07PM

25 A. Yes. 04:07PM

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1 Q. Okay. Do you recognize this e-mail? 04:07PM

2 A. I do. 04:07PM

3 Q. Okay. Earlier we agreed that you applied for 04:07PM

4 the position of GNETS program specialist in July -- on 04:08PM

5 July 30th, 2018, correct? 04:08PM

6 A. Yes. 04:08PM

7 Q. Okay. Would I be correct that you then were 04:08PM

8 officially on board as of October 2nd, 2018, given this 04:08PM

9 e-mail? 04:08PM

10 A. Yes. 04:08PM

11 Q. Okay. I just know you were curious about 04:08PM

12 dates, so -- 04:08PM

13 A. Yes. I didn't remember. 04:08PM

14 Q. Do you think you started before this or do you 04:08PM

15 think this was your first day? 04:08PM

16 A. I don't know. This is probably my first day, 04:08PM

17 maybe. 04:08PM

18 Q. Okay. So you likely became GNETS program 04:08PM

19 specialist on or around October 2nd, 2018? 04:08PM

20 A. Yes, because she might have sent this out on 04:08PM

21 the 2nd, but I might have started on the 1st or the 04:08PM

22 30th -- 04:08PM

23 Q. Or September 30th or something? 04:08PM

24 A. Yes. 04:08PM

25 Q. Okay. Thank you. 04:09PM

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1 THE WITNESS: And also, can we take a 04:09PM  
2 break? 04:09PM  
3 MS. TUCKER: No problem. 04:09PM  
4 THE VIDEOGRAPHER: Stand by. 04:09PM  
5 MS. TUCKER: Do you want to come back in 10 04:09PM  
6 minutes? 04:09PM  
7 MS. JOHNSON: Yes. 04:09PM  
8 THE VIDEOGRAPHER: Off the record at 4:10. 04:09PM  
9 (Off the record at 4:10 p.m.) 04:09PM  
10 THE VIDEOGRAPHER: Stand by. Back on the 04:18PM  
11 record at 4:20 p.m. 04:19PM  
12 Q. BY MS. TUCKER: Hi, Dr. Stevenson. Are you 04:19PM  
13 familiar with The New Yorker's magazine article on GNETS 04:19PM  
14 from 2018 titled: "Georgia's Separate and unequal 04:19PM  
15 Special Education system"? 04:19PM  
16 A. Yes. 04:19PM  
17 Q. How were you made aware of this article? 04:19PM  
18 A. Someone told me about it. It might have been 04:19PM  
19 Vickie. 04:19PM  
20 Q. Okay. What did you think of the article? 04:19PM  
21 A. I'm trying to think about -- 04:19PM  
22 Q. Here. I can -- 04:19PM  
23 MS. TUCKER: This was what was already 04:19PM  
24 introduced as Plaintiff Exhibit 397. 04:19PM  
25 (Previously marked Exhibit 397 introduced 04:20PM

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1 into evidence.)

03:54PM

2 Q. BY MS. TUCKER: This is a September 25th, 2018  
3 e-mail from Vickie Cleveland to the GNETS directors  
4 forwarding The New Yorker article.

04:20PM

04:20PM

04:20PM

5 Q. And The New Yorker article is behind it.

04:20PM

6 A. (Witness examining document.) I thought it

04:20PM

7 was -- I don't know. I mean, I don't know what I

04:20PM

8 thought. What did I think? I thought it was a -- I

04:20PM

9 don't know. I really don't remember what I thought

04:21PM

10 about it, but if I could try to remember after reading

04:21PM

11 it. It's been a long time since I read it, so... I

04:21PM

12 don't know.

04:21PM

13 Q. Do you recall if there were any conversations  
14 within GaDOE about the article?

04:21PM

04:21PM

15 A. I don't.

04:21PM

16 Q. Did the articles allegations prompt any  
17 research into any of the regional GNETS programs by  
18 GaDOE?

04:21PM

04:21PM

04:21PM

19 A. I'm not sure.

04:21PM

20 Q. Did it prompt any conversations with regional  
21 GNETS programs by GaDOE?

04:22PM

04:22PM

22 MS. JOHNSON: Objection.

04:22PM

23 THE WITNESS: I don't know.

04:22PM

24 Q. BY MS. TUCKER: Did you participate in any

04:22PM

25 conversations with regional GNETS programs regarding the

04:22PM



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1	article?	04:22PM
2	A. No.	04:22PM
3	Q. Do Georgia charter schools refer students to	04:22PM
4	GNETS?	04:22PM
5	A. They are LEAs.	04:22PM
6	Q. Can you elaborate charter schools are LEA?	04:22PM
7	A. Charter schools are their own LEAs, so LEAs	04:22PM
8	have the ability to send students to GNETS.	04:22PM
9	Q. Is the process different for charter schools?	04:22PM
10	A. It's still a decision made within a IEP	04:22PM
11	meeting.	04:22PM
12	MS. TUCKER: Okay. I'd like to hand the	04:23PM
13	Court Reporter what will be Plaintiff's Exhibit 441.	04:23PM
14	(Plaintiff's Exhibit 441 marked for	04:23PM
15	identification.)	04:23PM
16	Q. BY MS. TUCKER: The Bates number on the first	04:23PM
17	page of this document is GA00944717. This is a	04:23PM
18	March 7th, 2019 e-mail from you to Vickie Cleveland with	04:23PM
19	the subject: "Charter list." And there's one	04:23PM
20	attachment.	04:23PM
21	A. (Witness examining document.)	04:23PM
22	Q. Dr. Stevenson, do you recognize this e-mail?	04:23PM
23	A. Yes.	04:23PM
24	Q. Do you see where you ask Vickie Cleveland to	04:23PM
25	take a look at the list?	04:24PM

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1 A. Yes.

04:23PM

2 Q. Okay. So let's turn to that list, which is the  
3 attachment which begins on GA00944718.

04:24PM

04:24PM

4 A. Yes.

04:24PM

5 Q. Do you recognize this chart?

04:24PM

6 A. I do.

04:24PM

7 Q. The top reads: "GNETS list for charter  
8 schools."

04:24PM

04:24PM

9 A. Yes.

04:24PM

10 Q. Did you create this chart?

04:24PM

11 A. Possibly. Yes. I think so.

04:24PM

12 Q. What does this chart reflect?

04:24PM

13 A. The region in which the charter school is  
14 located. So if a student came from Atlanta Heights  
15 Charter they would go to North Metro based on the  
16 location of the charter school.

04:24PM

04:24PM

04:24PM

04:24PM

17 Q. Got it. So there are only four of the 24  
18 regional GNETS programs represented on this chart,  
19 correct?

04:24PM

04:24PM

04:24PM

20 A. Right.

04:24PM

21 Q. Do the other 20 regional GNETS programs have  
22 charter schools within that send students to GNETS?

04:24PM

04:24PM

23 A. Yes. This is probably not the full list.

04:25PM

24 Q. It's not complete?

04:25PM

25 A. Right.

04:25PM

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1 Q. Why did you create this chart?

04:25PM

2 A. Because if a student -- sometimes we get calls  
3 from charter schools and they don't know what GNETS that  
4 their students would go to, so instead of trying to look  
5 it up every time, we would have a chart that we can just  
6 go to and say what charter school are you from, this is  
7 the GNETS that serves your school.

04:25PM

04:25PM

04:25PM

04:25PM

04:25PM

04:25PM

8 Q. Okay. Is it -- since they're their own school  
9 district, correct?

04:25PM

04:25PM

10 A. Yes.

04:25PM

11 Q. The charter school?

04:25PM

12 A. They're there own LEA.

04:25PM

13 Q. So how do you know that Genesis Innovation  
14 Academy would go to North Metro GNETS if it's its own  
15 LEA?

04:25PM

04:25PM

04:25PM

16 A. Because it's within the North Metro GNETS  
17 service area or region.

04:25PM

04:25PM

18 Q. The geographic bounds?

04:25PM

19 A. Within that -- North Metro is within I forget  
20 which RESA -- it's within that RESA area that North  
21 Metro serves.

04:25PM

04:26PM

04:26PM

22 Q. Are these state charter schools?

04:26PM

23 A. I don't know. They could be state or they  
24 could be whatever the -- I'm not familiar with the  
25 different types of charter schools, so I don't know.

04:26PM

04:26PM

04:26PM

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1 Q. Okay. Going back to your e-mail, do you see 04:26PM  
2 where you wrote, "Also we listed the cyber schools but 04:26PM  
3 since cyber is statewide, should we remove them from the 04:26PM  
4 list"? 04:26PM

5 A. Mm-hmm. 04:26PM

6 Q. Who is "we" in your sentence? 04:26PM

7 A. We, Vickie and I. 04:26PM

8 Q. Can you clarify what you meant by whether we 04:26PM  
9 remove cyber schools from the list? 04:26PM

10 A. So Cyber serves the whole state. So if a kid 04:26PM  
11 is in Savannah, they wouldn't go to North Metro so we 04:26PM  
12 shouldn't put them on the list under any specific 04:27PM  
13 program, there should be -- and I think on the one 04:27PM  
14 there's an asterisk that says cyber because it wouldn't 04:27PM  
15 make sense to assign them to a specific one when they 04:27PM  
16 serve the whole state. 04:27PM

17 Q. Okay. So there's a final document that you 04:27PM  
18 refer to? 04:27PM

19 A. There might be. I'm not sure. I feel like 04:27PM  
20 there is but I don't remember. 04:27PM

21 Q. So if a charter school calls you, it sounded 04:27PM  
22 like you wanted to use this as a resource, you're not 04:27PM  
23 sure if that resource exists? 04:27PM

24 A. I'm not sure if I completed the resource, but 04:27PM  
25 if they called me at this point and I don't have the 04:27PM

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1 resource, I would just see where they're located and 04:27PM  
2 look and see what GNETS student should go to. 04:27PM

3 Q. Going back to the Georgia Cyber Academy. If a 04:27PM  
4 student who was in Georgia Cyber Academy needed GNETS 04:27PM  
5 services, how would that happen? 04:27PM

6 A. I don't know. That's discussed within the IEP 04:27PM  
7 meeting. I've never been involved in a conversation 04:28PM  
8 like that so I don't know. 04:28PM

9 Q. Have you had any conversations with Georgia 04:28PM  
10 Cyber Academy about GNETS? 04:28PM

11 A. I have not. 04:28PM

12 Q. Does GNETS provide services to State's DJJ 04:28PM  
13 schools? 04:28PM

14 A. I don't know. 04:28PM

15 Q. The Department of Juvenile Justice schools? 04:28PM

16 A. I know what that is but I don't know if we do. 04:28PM

17 Q. You're not sure how that works? 04:28PM

18 A. Not I'm not. Not specific to DJJ, no I'm not. 04:28PM

19 MS. TUCKER: Okay. I'd like the Court 04:28PM  
20 Reporter to mark this document as plaintiff's 04:28PM  
21 Exhibit 442. 04:28PM

22 (Plaintiff's Exhibit 442 marked for 04:29PM  
23 identification.) 04:29PM

24 Q. BY MS. TUCKER: The Bates number on the bottom 04:29PM  
25 of this document reads GA00957816. It is a June 30th, 04:29PM

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1	2020, e-mail from you to Vickie Cleveland with the	04:29PM
2	subject: "Coastal Georgia Comprehensive Academy-Home."	04:29PM
3	Dr. Stevenson, do you recognize this	04:29PM
4	e-mail?	04:29PM
5	A. I do.	04:29PM
6	Q. In this e-mail, am I correct that you advised	04:29PM
7	Vickie Cleveland that Coastal Georgia Comprehensive	04:29PM
8	Academy's website contains outdated information about	04:29PM
9	GNETS?	04:29PM
10	A. Yes.	04:29PM
11	Q. And Coastal Georgia Comprehensive Academy is	04:29PM
12	one of the 24 regional GNETS programs?	04:29PM
13	A. Yes.	04:29PM
14	Q. What outdated information did this program have	04:29PM
15	on its website?	04:29PM
16	A. I would need the rest of the e-mail to know.	04:29PM
17	Q. This is the entirety of the e-mail?	04:30PM
18	A. That's it?	04:30PM
19	Q. This was how it was produced to us in full.	04:30PM
20	A. I don't know.	04:30PM
21	Q. Okay. You noticed outdated information on	04:30PM
22	their website, is that correct, from this e-mail?	04:30PM
23	A. From the e-mail, yes.	04:30PM
24	Q. And again, do you have any reason to doubt this	04:30PM
25	e-mail?	04:30PM

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1 A. I do not.

04:30PM

2 Q. What steps do you take or what steps did you  
3 take?

04:30PM

04:30PM

4 A. I shared it with Vickie.

04:30PM

5 Q. Did you contact Coastal Georgia Comprehensive  
6 Academy?

04:30PM

04:30PM

7 A. I don't recall if I did. I'm sure if I didn't,  
8 Vickie did since I sent it to her.

04:30PM

04:30PM

9 Q. Do you regularly monitor the regional GNETS  
10 programs website?

04:30PM

04:30PM

11 A. No.

04:30PM

12 Q. Did you stumble on this then?

04:30PM

13 A. I think I was looking for -- sometimes I might  
14 not have like a name or something and I might look to  
15 see on the website and I probably stumbled across it.

04:30PM

04:30PM

04:31PM

16 MS. TUCKER: Okay. I'd like the Court  
17 Reporter to mark this document as Plaintiff's  
18 Exhibit 443.

04:31PM

04:31PM

04:31PM

19 (Plaintiff's Exhibit 443 marked for  
20 identification.)

04:31PM

04:31PM

21 Q. BY MS. TUCKER: Okay. The Bates on the bottom  
22 of this documents reads GA -- hold on. GA00957939.  
23 This is July 6th, 2020 e-mail from you to Vickie  
24 Cleveland with a subject: "Website updates." There is  
25 one attachment.

04:31PM

04:31PM

04:31PM

04:32PM

04:32PM

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1	A. (Witness examining document.)	04:32PM
2	Q. Dr. Stevenson, do you recognize this e-mail?	04:32PM
3	A. I do.	04:32PM
4	Q. Am I correct that you were providing edits to	04:32PM
5	GaDOE GNETS website or web page, excuse me?	04:32PM
6	A. Yes.	04:32PM
7	Q. Is it part of your job to manage the GNETS web	04:32PM
8	page within GaDOE's website?	04:32PM
9	A. Not to manage it, no.	04:32PM
10	Q. Is it one of your responsibilities to	04:32PM
11	provide --	04:32PM
12	A. I provide.	04:32PM
13	Q. Please go ahead.	04:32PM
14	A. I'm sorry I was talking over you. My	04:32PM
15	apologies.	04:32PM
16	Q. Is it one of your responsibilities to provide	04:32PM
17	updates to the GNETS web page within GaDOE's website?	04:32PM
18	A. As directed by the program manager, Vickie	04:32PM
19	Cleveland.	04:32PM
20	Q. Do you ever look at it yourself and proactively	04:32PM
21	think, I need to make a change?	04:32PM
22	A. If I do, I'll go Vickie to discuss.	04:32PM
23	Q. And Vickie is the ultimate approval?	04:33PM
24	A. I'm not sure if she has to send it to someone	04:33PM
25	else, but that's who I send it to.	04:33PM



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1 Q. Here you say you removed, "Program" from the 04:33PM  
2 website. Do you see that? 04:33PM

3 A. Yes. 04:33PM

4 Q. Why is that? 04:33PM

5 A. Because when looking at the Georgia Network of 04:33PM  
6 Education and Therapeutic Supports is the title, so we 04:33PM  
7 were just wondering why do we have program afterwards. 04:33PM  
8 GNETS encompasses all 24 programs so why not just say 04:33PM  
9 GNETS. 04:33PM

10 Q. Okay. Do you see where you then write: "I 04:33PM  
11 just finished reviewing each GNETS site web page and 04:33PM  
12 making notes"? 04:33PM

13 A. Mm-hmm. 04:33PM

14 Q. And is this something that you regularly do? 04:33PM

15 A. No. 04:33PM

16 Q. You were directed to do it? 04:33PM

17 A. Probably. 04:34PM

18 Q. Who directed you? 04:34PM

19 A. Vickie. 04:34PM

20 Q. What were you looking for in this review? 04:34PM

21 A. I'm not sure. 04:34PM

22 Q. And you were making notes? 04:34PM

23 A. I was making notes of those people who probably 04:34PM  
24 needed to make changes. 04:34PM

25 Q. You then write: "I was going to wait until we 04:34PM

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1 updated our website before I made the calls to them,  
2 them being the regional programs"; is that correct?

3 A. That is correct.

4 Q. "I was going to let them know we have also made  
5 updates and they can refer to our site for the exact  
6 wording when they update their web sites"; is that  
7 correct?

8 A. Yes.

9 Q. Is that to ensure consistency?

10 A. Or to make sure they don't have incorrect  
11 information. Yes.

12 Q. Do you recall what exactly you were looking for  
13 on the regional GNETS program web sites?

14 A. I don't.

15 Q. Do you recall whether the regional GNETS  
16 programs then implemented the feedback?

17 A. I'm not sure.

18 Q. Did you look again to make -- to confirm  
19 whether there was incorrect information, that was  
20 something you were doing?

21 A. I don't know if -- if and when I did, I  
22 couldn't give you a time because I don't remember.

23 Q. Have you looked in the last six months on GNETS  
24 -- regional GNETS program web sites?

25 A. No.

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1	Q. In the last six months?	04:35PM
2	A. (Nodding no.)	04:35PM
3	Q. In the last year?	04:35PM
4	A. Maybe. I don't know.	04:35PM
5	Q. The last sentence reads: "Just trying to think	04:35PM
6	ahead of them"?	04:35PM
7	A. Mm-hmm.	04:35PM
8	Q. What did you mean here?	04:35PM
9	A. The GNETS directors because if we tell them to	04:35PM
10	do it and then they're like well what should we put if	04:35PM
11	what I have is wrong, then we'll already have something	04:35PM
12	to share with them.	04:35PM
13	Q. Thank you.	04:35PM
14	A. Mm-hmm.	04:35PM
15	MS. TUCKER: I'd like the Court Reporter to	04:35PM
16	mark this document as Plaintiff's Exhibit 444.	04:35PM
17	(Plaintiff's Exhibit 444 marked for	04:36PM
18	identification.)	04:36PM
19	Q. BY MS. TUCKER: The Bates number on the first	04:36PM
20	page of this document is GA00952856. This is an e-mail	04:36PM
21	dated October 15th, 2019, from you to Vickie Cleveland.	04:36PM
22	There is no subject but there are four attachments.	04:36PM
23	A. (Witness examining document.)	04:36PM
24	Q. Dr. Stevenson, do you recognize this e-mail and	04:36PM
25	these attachments?	04:36PM

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1 A. I see the e-mail, so yes. And I'm trying to 04:36PM  
2 see if looking at the attachments will jog my memory. 04:37PM  
3 Yes. 04:37PM

4 Q. Let's look at the first attachment which starts 04:37PM  
5 with GAO0952857. Do you see that document? 04:37PM

6 A. I do. 04:37PM

7 Q. And you recognize this document? 04:37PM

8 A. I do. 04:37PM

9 Q. And I'm correct that the top reads: "Feedback 04:37PM  
10 form, Special Education director"? 04:37PM

11 A. Yes. 04:37PM

12 Q. Did you create this document? 04:37PM

13 A. I did not. 04:37PM

14 Q. Who created it? 04:37PM

15 A. This was a form GLRS, and I think it was two 04:37PM  
16 district liaisons and it was being spearheaded by GLRS, 04:37PM  
17 and the GLRS program manager at the state wanted 04:37PM  
18 collaboration for GLRS to have one pagers for -- to give 04:37PM  
19 to special Ed directors and for different 04:37PM  
20 transportation, what it says on the e-mail. So I did 04:38PM  
21 not create the form but I was in the -- a few of the 04:38PM  
22 meetings when they were working on the form. So I sent 04:38PM  
23 this to Vickie because she was not in those meetings 04:38PM  
24 with the other district liaisons and program 04:38PM  
25 specialists. 04:38PM

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1 Q. So these were meetings that you attended with 04:38PM  
2 GLRS? 04:38PM

3 A. With GLR -- well, it wasn't all GLRS people, I 04:38PM  
4 don't remember who specifically. And I think it was one 04:38PM  
5 or two district liaisons and they were coming up with 04:38PM  
6 this, but I didn't create the form, no. 04:38PM

7 Q. Did you provide feedback on the form? 04:38PM

8 A. If asked. 04:38PM

9 Q. Do you recall whether you or Vickie sought to 04:37PM  
10 provide feedback? 04:39PM

11 A. I mean, yes, if they asked then we did for 04:39PM  
12 sure. 04:39PM

13 Q. Okay. 04:39PM

14 A. But I couldn't tell you what specifically I 04:39PM  
15 said or anything like that. But definitely it was a 04:39PM  
16 conversation. 04:39PM

17 Q. If you turn to the next page do you see where 04:39PM  
18 it reads: "How do I know when I need to contact the 04:39PM  
19 GNETS program about student concerns?" 04:39PM

20 A. Yes. Yes. 04:39PM

21 Q. So was this question that was added to this one 04:39PM  
22 pager something that GLRS discussed with you or Vickie 04:39PM  
23 given you were, you know, or the GNETS program manager 04:39PM  
24 and program specialist? 04:39PM

25 A. Well, these were drafts so these were things 04:39PM

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1 that were in constant conversation.

04:39PM

2 Q. Mm-hmm.

04:39PM

3 A. So these were not ever final and these never --  
4 these are not -- these were not ever finalized.

04:39PM

04:39PM

5 Q. Never finalized?

04:39PM

6 A. No.

04:39PM

7 Q. Okay. Is there anything similar to -- similar  
8 for the LEAs that has been created by GLRS or by you or  
9 Vickie as GNETS program manager and program specialist?

04:39PM

04:40PM

04:40PM

10 A. No.

04:40PM

11 Q. Dr. Stevenson --

04:40PM

12 MS. TUCKER: Well, yes, the Court Reporter,  
13 I'm going to hand this over, and if you can mark this as  
14 445, Plaintiff's Exhibit 445.

04:40PM

04:40PM

04:40PM

15 (Plaintiff's Exhibit 445 marked for  
16 identification.)

04:40PM

04:40PM

17 Q. BY MS. TUCKER: The Bates number on the bottom  
18 of this first page reads GA00958932. This is an e-mail  
19 thread with the most represent e-mail dated August 5th,  
20 2020, from you to Vickie Cleveland with the subject:  
21 "NM GNETS survey." There is one attachment.

04:40PM

04:40PM

04:41PM

04:41PM

04:41PM

22 A. (Witness examining document.)

04:41PM

23 Q. Dr. Stevenson, do you recognize this e-mail?

04:41PM

24 A. I do.

04:41PM

25 Q. I'm sorry?

04:41PM

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1 A. I do.

04:41PM

2 Q. Okay. And then looking at the earliest e-mail  
3 in the chain, am I correct that you're writing to the  
4 North Metro regional GNETS program director and asking  
5 how they're providing services through GNETS; I mean,  
6 services during COVID?

04:41PM

04:41PM

04:41PM

04:41PM

04:41PM

7 A. Yes.

04:41PM

8 Q. I know this is to the North Metro program. Did  
9 you write a similar e-mail to all regional GNETS  
10 programs?

04:41PM

04:41PM

04:41PM

11 A. Yes.

04:41PM

12 Q. Okay. Let's look at the attachment, which my  
13 colleague will bring up electronically, which begins  
14 with GA00958934.

04:41PM

04:41PM

04:42PM

15 A. I see it.

04:42PM

16 Q. You see it?

04:42PM

17 A. Yes.

04:42PM

18 Q. Okay. Mine is still loading.

04:42PM

19 Am I correct that this spreadsheet details  
20 how the regional GNETS programs plan to provide  
21 instruction and services during the COVID-19 pandemic?

04:42PM

04:42PM

04:42PM

22 A. Yes.

04:42PM

23 Q. Were you directed to make this spreadsheet?

04:42PM

24 A. Yes.

04:42PM

25 Q. By whom?

04:42PM

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1 A. Vickie Cleveland. 04:42PM

2 Q. Okay. What did GaDOE do with this information? 04:42PM

3 A. This was not just a GNETS specific initiative. 04:42PM

4 This was something that all of the LEAs had to do 04:42PM

5 regarding special education for the state. So not just 04:42PM

6 GNETS programs LEAs, special education as well. 04:42PM

7 Q. Did the LEAs also contact GNETS programs that 04:43PM

8 sat within them? 04:43PM

9 A. I'm not sure. 04:43PM

10 Q. But you contacted all the GNETS programs? 04:43PM

11 A. Because we had to let them know they needed to 04:43PM

12 complete it. I'm sure -- I'm not sure, I'm not going to 04:43PM

13 say I'm sure but the special directors probably reached 04:43PM

14 out as well. 04:43PM

15 Q. What did GaDOE do with this information? 04:43PM

16 A. I have no idea. I just submitted it. 04:43PM

17 Q. Did you, again, ask the regional GNETS program 04:43PM

18 these questions or was it just a one time? 04:43PM

19 A. No. That was just for COVID in August. 04:43PM

20 Q. Okay. And you didn't ask again during the 04:43PM

21 pandemic? 04:43PM

22 A. Not if I wasn't asked to, and I don't recall 04:43PM

23 being asked to do that. 04:43PM

24 Q. Did you get a lot of questions or did you get 04:43PM

25 questions from the regional GNETS programs regarding 04:43PM



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1 COVID and how to serve students?

04:44PM

2 A. There was a lot of webinars and things that  
3 came from the state directly to special Ed directors and  
4 GNETS directors within the state directors meetings that  
5 they gave specific information on, so it was to all --  
6 not specific to GNETS.

04:44PM

04:44PM

04:44PM

04:44PM

04:44PM

7 Q. Did any GNETS director reach out to you  
8 specifically with questions?

04:44PM

04:44PM

9 A. No.

04:44PM

10 Q. Did you and Vickie provide any technical  
11 assistance to regional GNETS programs during the  
12 COVID-19 pandemic about how to serve students?

04:44PM

04:44PM

04:44PM

13 A. That was done through the special Ed division,  
14 general supervision, so for everyone.

04:44PM

04:44PM

15 Q. So what type of supports were provided at that  
16 time from GaDOE to everyone?

04:44PM

04:44PM

17 A. I'm not sure.

04:44PM

18 Q. Earlier I asked a question of whether it would  
19 be helpful to track the progress of students once they  
20 return -- or once they go to their home school from  
21 GNETS, do you recall that?

04:44PM

04:45PM

04:45PM

04:45PM

22 A. Yes.

04:45PM

23 Q. And you said you wanted to think about it --

04:45PM

24 A. Mm-hmm.

04:45PM

25 Q. -- and for me to come back to it?

04:45PM

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1 A. So can you provide me a little bit more clarity 04:45PM  
2 on that. 04:45PM

3 Q. Sure. I had asked you whether you and Vickie, 04:45PM  
4 in the GNETS program, at the state track information 04:45PM  
5 about students who exit GNETS and their success once 04:45PM  
6 they exit, and I -- do you recall that question? 04:45PM

7 A. I do. Can I ask a clarifying question? 04:45PM

8 Q. Sure. 04:45PM

9 A. When you say "success," what do you mean by 04:45PM  
10 success? 04:45PM

11 Q. Academic progress, ability to stay in their 04:45PM  
12 home schools with proper services and supports? 04:45PM

13 A. Okay. 04:45PM

14 Q. Do you think it would be helpful to track the 04:45PM  
15 progress of students once they return to Gen Ed from 04:46PM  
16 GNETS? 04:46PM

17 MS. JOHNSON: Objection. 04:46PM

18 THE WITNESS: And also they may not 04:46PM  
19 necessarily be in GNETS. 04:46PM

20 Q. BY MS. TUCKER: I'm asking about those who are 04:46PM  
21 in Gen Ed? 04:46PM

22 A. Oh. I'm not sure. Maybe. 04:46PM

23 Q. Why maybe? 04:46PM

24 A. I mean, I think the LEAs should know which 04:46PM  
25 students are moving back, because they're within their 04:46PM

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1 LEA, so I think it might be good to know for that 04:46PM  
2 reason, but -- 04:46PM

3 Q. But you as -- 04:46PM

4 A. -- that's a very -- that's a very -- what's the 04:46PM  
5 word I'm trying to think of. That's a very -- that's a 04:47PM  
6 question that I would really need to spend some time 04:47PM  
7 with my thoughts. 04:47PM

8 Q. Okay. And I understand that you're saying you 04:47PM  
9 think it's important for the LEAs, but for you as GNETS 04:47PM  
10 program specialist or Vickie as GNETS program manager? 04:47PM

11 A. I think it's important for a child to be 04:47PM  
12 successful no matter where they are. 04:47PM

13 Q. Earlier you also asked me to come back to 04:47PM  
14 another question. I asked you whether it's important 04:47PM  
15 for students to have access to playground, science lab, 04:47PM  
16 art rooms, music rooms? 04:47PM

17 A. Mm-hmm. 04:47PM

18 Q. Do you recall that? 04:47PM

19 A. I do. 04:47PM

20 Q. Do you have an opinion on whether it's 04:47PM  
21 important for students to have access to those 04:47PM  
22 playgrounds, science labs, art rooms and music rooms? 04:47PM

23 MS. JOHNSON: Objection. 04:48PM

24 THE WITNESS: There are many students in 04:47PM  
25 Georgia who are in regular schools and don't have access 04:47PM

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1 to those things. So inequality exists in all areas. 04:48PM

2 Q. BY MS. TUCKER: I understand what you're 04:48PM  
3 saying, but I'd like for you to answer the question. Do 04:48PM  
4 you think whether it's important for students to have 04:48PM  
5 access to playgrounds, science labs, art rooms and music 04:48PM  
6 rooms? 04:48PM

7 MS. JOHNSON: Objection. 04:48PM

8 THE WITNESS: I think it's important for 04:48PM  
9 students to have access to things that are going to help 04:48PM  
10 them to be successful in their individual IEP plans. 04:48PM

11 Q. BY MS. TUCKER: Do you think that these would 04:48PM  
12 help a student be successful? 04:48PM

13 MS. JOHNSON: Objection. 04:48PM

14 THE WITNESS: I think that's based on the 04:48PM  
15 student. 04:48PM

16 Q. BY MS. TUCKER: And so given your time as a 04:48PM  
17 special education teacher, a special education lead -- 04:48PM

18 A. Mm-hmm. 04:48PM

19 Q. -- if your schools didn't have a playground or 04:48PM  
20 a science lab or art room or music room, would that have 04:48PM  
21 concerned you? 04:48PM

22 A. I've -- 04:48PM

23 MS. JOHNSON: Objection. 04:48PM

24 THE WITNESS: I've taught in schools where 04:48PM  
25 we didn't have those things, so... 04:49PM

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1 Q. BY MS. TUCKER: Did that raise concerns for 04:49PM  
2 you? 04:49PM

3 A. The students still received recess; the 04:48PM  
4 students still received art; the students still received 04:48PM  
5 music, they just didn't receive it in a specified room. 04:49PM  
6 The art teacher pushed into the classroom; the music 04:49PM  
7 teacher pushed into the classroom. We did recess in a 04:49PM  
8 gym or we did recess outside, so they still had it, they 04:49PM  
9 just didn't have it in a specified area. 04:49PM

10 Q. Okay. Are there children that would not 04:49PM  
11 benefit from playgrounds, science labs, art rooms or 04:49PM  
12 music rooms? 04:49PM

13 MS. JOHNSON: Objection. 04:49PM

14 THE WITNESS: I think it just depends on 04:49PM  
15 the student. 04:49PM

16 Q. BY MS. TUCKER: Earlier I referenced a 2010 04:49PM  
17 audit. 04:49PM

18 A. Mm-hmm. 04:49PM

19 Q. And you did -- am I correct that you were not 04:49PM  
20 familiar with it? 04:49PM

21 A. No, I'm not. 04:49PM

22 Q. Have you heard about -- have you ever heard of 04:49PM  
23 a 2010 audit of the GNETS program? 04:49PM

24 A. I've heard it in reference to people saying the 04:49PM  
25 2010 audit of the GNETS program, but I've never seen it 04:50PM

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1 or no one has ever had any discussion with me about it. 04:50PM

2 Q. Or how that has potentially shaped your current 04:50PM  
3 responsibilities? 04:50PM

4 A. Not that I can recall. 04:50PM

5 Q. Earlier we were talking about i-Ready? 04:50PM

6 A. Mm-hmm. 04:50PM

7 Q. And you mentioned there was one LEA that pays 04:50PM  
8 for i-Ready? 04:50PM

9 A. Yes. Yes. 04:50PM

10 Q. On itself? 04:50PM

11 A. Yes. 04:50PM

12 Q. The GaDOE funds, the regional GNETS programs, 04:50PM  
13 i-Ready accounts, except for those that are in 04:50PM  
14 Savannah-Chatham, is that correct? 04:50PM

15 A. Yes. 04:50PM

16 Q. Okay. Am I correct that you've said it's 04:50PM  
17 because Savannah-Chatham has i-Ready for all its 04:50PM  
18 students? 04:50PM

19 A. Yes. And they offered to pay for it. I guess 04:50PM  
20 that's an in-kind service for that particular -- for 04:50PM  
21 their program because Savannah-Chatham only serves 04:50PM  
22 Savannah-Chatham kids. So there are no other LEAs at 04:50PM  
23 Savannah-Chatham GNETS, but Savannah-Chatham kids. 04:51PM

24 Q. Are they everywhere else besides 04:51PM  
25 Savannah-Chatham? If i-Ready is used, is that only for 04:51PM

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1 GNETS students then?

04:51PM

2 MS. JOHNSON: Objection.

04:51PM

3 THE WITNESS: Not necessarily.

04:51PM

4 Q. BY MS. TUCKER: What do you mean by not  
5 necessarily?

04:51PM

04:51PM

6 A. I-Ready is a popular supplemental program, so  
7 many LEAs use it. So Savannah-Chatham just decided they  
8 were going to pay for it, for that, their GNETS program.  
9 But many LEAs use i-Ready.

04:51PM

04:51PM

04:51PM

04:51PM

10 Q. Okay. Earlier when you were talking about the  
11 GNETS program in general --

04:51PM

04:51PM

12 A. Mm-hmm.

04:51PM

13 Q. -- you mentioned it was for severe and  
14 behavioral concerns?

04:51PM

04:51PM

15 A. Characteristics.

04:51PM

16 Q. Characteristic --

04:51PM

17 A. Characteristics of those.

04:51PM

18 Q. Okay. So severe, emotional and behavioral  
19 characteristics; is that correct?

04:51PM

04:51PM

20 A. Students who exhibit characteristics of severe  
21 emotional behavior disorders.

04:51PM

04:52PM

22 Q. Is that different than having a EBD  
23 designation?

04:52PM

04:52PM

24 A. Some students cannot have a EBD designation but  
25 have characteristics of EBD.

04:52PM

04:52PM

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1 Q. Okay. But severe behavioral and emotional  
2 characteristics is not a known diagnosis or is it?

3 A. It's a disability category.

4 Q. It is. That's outside of EBD?

5 A. No. I'm saying that EBD is a disability  
6 category.

7 Q. Okay.

8 A. Yes, it is. That might not be a student's  
9 primary, but it might be their secondary.

10 Q. Okay. Do you consider GNETS to be on the  
11 continuum of therapeutic services that the State of  
12 Georgia offers to students?

13 A. It's on the continuum of services for students  
14 with IEPs.

15 MS. JOHNSON: Objection.

16 Q. BY MS. TUCKER: I'd like to turn back to  
17 Exhibit 421.

18 A. (Witness complying.)

19 Q. Let me know when you have it.

20 A. (Witness complying.)

21 Q. Do you have it?

22 A. I do.

23 Q. Okay. Would you turn to the second page with  
24 GAO0953299, with the GNETS program specialist  
25 responsibilities.



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1 A. Yes.

04:53PM

2 Q. Okay. There were a few of these that you  
3 wanted to think about, so I wanted to go back to them.

04:53PM

4 Let's see. On the devised GNETS staff and stakeholders  
5 on State Board rules for GNETS, I think you had said you  
6 wanted to come back to that. But I wanted to confirm  
7 whether you now think it's the GNETS rule that we  
8 discussed later?

04:53PM

04:53PM

04:54PM

04:54PM

04:54PM

04:54PM

9 A. (Witness examining document.)

04:54PM

10 MS. JOHNSON: Object to form.

04:54PM

11 Q. BY MS. TUCKER: The bullet that reads: "Advise  
12 GNETS staff and stakeholders on State Board rule for  
13 GNETS." What does the State Board rule refer to?

04:54PM

04:54PM

04:54PM

14 A. (Witness examining document.) I mean, it says  
15 the State Board rule for GNETS, so that's what I would  
16 assume it's referring to.

04:54PM

04:54PM

04:54PM

17 Q. The GNETS rule?

04:54PM

18 A. That would be my assumption.

04:54PM

19 Q. Okay. And then the bullet that reads:

04:55PM

20 "Collaborate with GLRS PM on GNETS reintegration." Do  
21 you see that?

04:55PM

04:55PM

22 A. I do.

04:55PM

23 Q. We talked about a few other times about GLRS.  
24 So what other -- what else do you work on with GLRS?

04:55PM

04:55PM

25 A. Just that one document we discussed.

04:55PM

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1 Q. That's it?

04:55PM

2 A. Yes.

04:55PM

3 Q. Do you recall if any -- looking at this, do you  
4 -- have you thoughts about the responsibilities that are  
5 missing?

04:55PM

04:55PM

04:55PM

6 A. (Witness examining document.) To work on  
7 request from lawsuit that is requested.

04:55PM

04:56PM

8 Q. Fair. Have you proposed recommendations to the  
9 GNETS program in your role as GNETS program specialist?

04:56PM

04:56PM

10 A. Recommendations to Vickie?

04:56PM

11 Q. Yes.

04:56PM

12 A. We've had discussions.

04:56PM

13 Q. What were those discussions about?

04:56PM

14 A. Various things.

04:56PM

15 Q. Can you give me an example, Dr. Stevenson?

04:56PM

16 A. Maybe allowing the programs to choose a  
17 different supplemental instruction for older students  
18 because feedback was received that they thought i-Ready  
19 was a little babyish in the -- the interface. So a lot  
20 of the older kids didn't like to spend a lot of time on  
21 it, so maybe looking at some of the supplemental  
22 programs that those students could use.

04:56PM

04:56PM

04:56PM

04:56PM

04:57PM

04:57PM

04:57PM

23 Q. What other topics have you discussed with  
24 Vickie regarding ways to change the GNETS program?

04:57PM

04:57PM

25 MS. JOHNSON: Objection.

04:57PM

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1 THE WITNESS: I would have to spend some 04:57PM  
2 time. That's one that I've had recently. So that's the 04:57PM  
3 one that comes to the top of my mind. 04:57PM

4 Q. BY MS. TUCKER: With your background and 04:57PM  
5 experience, would you say there are any improvements 04:57PM  
6 that needs to happen, take place for the GNETS program? 04:57PM

7 A. I think education as a whole could be improved. 04:57PM  
8 Now, I have many thoughts on that. You want to talk 04:57PM  
9 about that? 04:57PM

10 Q. I'm interested in your thoughts on your role 04:57PM  
11 because you have a specific set of experiences with the 04:58PM  
12 GNETS program at this time. 04:58PM

13 A. I thought we should do more virtual and we're 04:58PM  
14 doing that. 04:58PM

15 Q. You wanted more virtual is that what you're 04:58PM  
16 saying? 04:58PM

17 A. Mm-hmm. 04:58PM

18 Q. What do you mean by more virtual? 04:58PM

19 A. Meetings because sometimes it's hard for all of 04:58PM  
20 the GNETS directors to drive from allover the state, to 04:58PM  
21 one location, and it saves money, so why not just do it 04:58PM  
22 virtually. So we have implemented that. 04:58PM

23 Q. What about any substantive changes given your 04:58PM  
24 educational background? 04:58PM

25 MS. JOHNSON: Objection. 04:58PM

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1 THE WITNESS: I do what I'm told. 04:58PM

2 Q. BY MS. TUCKER: So you don't take any steps 04:58PM  
3 proactively in your position? 04:58PM

4 A. I -- 04:58PM

5 MS. JOHNSON: Objection. 04:58PM

6 THE WITNESS: I gave you two examples of 04:59PM  
7 how I do that. 04:59PM

8 Q. BY MS. TUCKER: Which ones again? 04:59PM

9 A. I-Ready, virtual meetings. 04:59PM

10 Q. Okay. So you do what you're told, but also 04:59PM  
11 some proactive stuff? 04:59PM

12 A. Yes. 04:59PM

13 Q. Okay. Can we break for 15? 04:59PM

14 MS. JOHNSON: Yes. 04:59PM

15 THE VIDEOGRAPHER: Going off the record 04:59PM  
16 at -- is it 5 o'clock p.m. 04:59PM

17 (Off the record.) 04:59PM

18 THE VIDEOGRAPHER: Stand by. Back on the 05:17PM  
19 record at 5:19 p.m. 05:18PM

20 Q. BY MS. TUCKER: Great. Dr. Stevenson, I'd like 05:18PM  
21 to return to Exhibit 420. 05:18PM

22 A. (Witness complying.) 05:18PM

23 Q. It's probably the second or third exhibit I 05:18PM  
24 shared with you. It's with the job announcement. 05:18PM

25 A. Okay. 05:18PM

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1 Q. Let me know when you have it.

05:18PM

2 A. I have it.

05:18PM

3 Q. Great. Can you turn to GA00119324?

05:18PM

4 A. (Witness complying.)

05:18PM

5 Q. And this is the job announcement for the GNETS  
6 program specialist, correct?

05:18PM

05:18PM

7 A. Correct.

05:18PM

8 Q. Okay. Under --

05:18PM

9 A. Excuse me.

05:18PM

10 Q. You're good. Under minimum qualifications, do  
11 you see that a Master's degree in education is required  
12 for this position?

05:18PM

05:18PM

05:18PM

13 A. Yes.

05:18PM

14 Q. So, you know, you've mentioned some of your  
15 responsibilities. You've helped with nursing IT  
16 question. You start a PowerPoint. You've read the rule  
17 to the regional GNETS program, why is a Master's  
18 required for your position?

05:18PM

05:19PM

05:19PM

05:19PM

05:19PM

19 MS. JOHNSON: Objection.

05:19PM

20 THE WITNESS: That's something that people  
21 above my pay grade make decisions on. I don't know.

05:19PM

05:19PM

22 Q. BY MS. TUCKER: How have you used your  
23 experience and education, both your formal education,  
24 which include a master's degree in EdD, as well as your  
25 formal work experience, which includes being a Special

05:19PM

05:19PM

05:19PM

05:19PM

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1 Education teacher at -- I believe two districts and 05:19PM  
2 special education lead in two different counties too -- 05:19PM  
3 in this position to improve services for children in the 05:19PM  
4 GNETS program? 05:19PM

5 MS. JOHNSON: Objection. 05:19PM

6 THE WITNESS: I'll just say as I stated 05:19PM  
7 before, I have to work within the parameters that are 05:19PM  
8 given to me and I do my work to the best of my ability. 05:20PM

9 Q. BY MS. TUCKER: Have you wanted to make 05:20PM  
10 substantive suggestions that you haven't made to the 05:20PM  
11 GNETS program? 05:20PM

12 A. I probably have had some suggestions or 05:20PM  
13 thoughts in my role, but I'll also say it takes time to 05:20PM  
14 really -- it takes time to really -- once you're in a 05:20PM  
15 role, to really understand all the workings and all the 05:21PM  
16 things that goes into that. So I would say that even 05:21PM  
17 with my experience, this was a new role, so I can't come 05:21PM  
18 in just making recommendations until I've had experience 05:21PM  
19 in said role. 05:21PM

20 Q. Am I correct that you're hitting your four-year 05:21PM  
21 anniversary in this role? 05:21PM

22 A. Yes. 05:21PM

23 Q. Do you think that's enough time to raise 05:21PM  
24 suggestions? 05:21PM

25 A. I think this would probably be about the time 05:21PM

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1 when that -- when those type of conversations can  
2 happened.

3 Q. Are you planing on having those conversations?

4 MS. JOHNSON: Objection.

5 THE WITNESS: Possibly.

6 Q. BY MS. TUCKER: Who would you have the  
7 conversations with?

8 A. Vickie Cleveland.

9 Q. What are the pros and cons?

10 A. Pros and cons of --

11 Q. Having that conversation. You said possibly?

12 MS. JOHNSON: Objection.

13 THE WITNESS: I don't know. I mean, I  
14 don't know what the pros and cons would be. Maybe -- I  
15 don't know. All they can say is, don't like it or like  
16 it, so... I don't know.

17 Q. BY MS. TUCKER: What do you mean by that?

18 A. I mean, I could -- I could say we should send  
19 them peppermints on Tuesday, all she can say is no, I  
20 don't like that idea or yes, I like that idea. So I  
21 mean, I guess there's no real harm in making a  
22 suggestion.

23 Q. Do you feel that you have limitations in making  
24 a suggestion?

25 A. No. I don't feel like I have limitations.

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1 Q. Do you feel that you were using your 05:23PM  
2 educational background and your experience to the extent 05:23PM  
3 that you would like to? 05:23PM

4 A. I feel that -- 05:23PM

5 Q. In this role? 05:23PM

6 A. I feel that I -- I feel that in any position 05:23PM  
7 there is always room for growth. So I feel that there's 05:23PM  
8 always room for growth, no matter what position I'm in. 05:24PM  
9 And I feel like if I -- I think Vickie values my 05:24PM  
10 experience and my knowledge, but I also respect chain of 05:24PM  
11 command, and I try to function within that. 05:24PM

12 Q. Okay. All right. I think that is it from the 05:24PM  
13 United States. 05:24PM

14 MS. TUCKER: Anything? 05:24PM

15 MS. JOHNSON: No questions from the State. 05:24PM

16 MS. TUCKER: Thank you so much, 05:24PM  
17 Dr. Stevenson, for answering the questions today. 05:24PM

18 THE VIDEOGRAPHER: I apologize for asking 05:24PM  
19 this: Do you guys have standing orders with Esquire or 05:24PM  
20 do we need to take our video and transcripts on the 05:24PM  
21 record? 05:24PM

22 MS. JOHNSON: I think we have a standing 05:24PM  
23 order. 05:24PM

24 MS. TUCKER: I don't think we have any sort 05:24PM  
25 of standing order. 05:24PM



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1 THE VIDEOGRAPHER: Okay. Do you need to 05:24PM  
2 order at this time? 05:24PM

3 MS. TUCKER: No. 05:24PM

4 THE VIDEOGRAPHER: Okay. So if we're all 05:24PM  
5 in agreement, this concludes Lakesha Stevenson's 05:24PM  
6 deposition on September 22nd, 2022. We're going off the 05:25PM  
7 record at 5:26 p.m. 05:25PM

8 (Off the record.) 06:43PM

9  
10 (Whereupon, proceedings were concluded at  
11 4:26 p.m.)

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STATE OF GEORGIA)

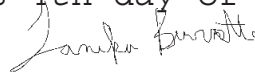
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COUNTY OF DEKALB)

I, TAMIKA M. BURNETTE, hereby certify  
that the foregoing proceedings were taken before me at  
the time and place therein designated; that a review of  
the transcript was requested, and that the foregoing  
pages numbered 1 through 288 are a true and correct  
record of the aforesaid proceedings.

I further certify that I am not a  
relative, employee, attorney or counsel of any of the  
parties, nor am I a relative or employee of any of the  
parties' attorneys or counsel connected with the action,  
nor am I financially interested in the action.

DATED this 4th day of October, 2022.



TAMIKA M. BURNETTE

CERTIFIED COURT REPORTER, RPR, CSR-2870

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1 the case, and a financial discount will not be given to  
2 any party to this litigation.

3  
4 Tamika M. Burnette, RPR, CCR2870.  
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Please read your deposition over carefully and make any necessary corrections. You should state the reason the in the appropriate space on the errata sheet for any corrections that are made.

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ACKNOWLEDGEMENT OF DEPONENT

I, \_\_\_\_\_, do hereby  
certify that I have read the foregoing pages \_\_\_\_\_  
to \_\_\_\_\_ and that the same is a correct transcript  
of the answers given by me to the questions therein  
propounded, except for corrections or changes in form or  
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Date

\_\_\_\_\_  
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Subscribed and sworn before me this  
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My Commission

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\_\_\_\_\_  
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